

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

DECLARATION OF KIRK LANE

In response to an evidentiary objection raised by the State of Connecticut and the State of Washington to the Declaration of Colin Jorgensen (ECF No. 4016-1), Kirk Lane declares as follows in accordance with 28 U.S.C. § 1746:

1. My name is Kirk Lane. I am the Arkansas Drug Director, a position that I have held since August 7, 2017. As Arkansas Drug Director, I oversee the Office of State Drug Director. In addition to my role as Arkansas Drug Director, I currently serve as the Chairperson of the Arkansas Alcohol and Drug Coordinating Council, and am a member of the Arkansas Prescription Monitoring Program Advisory Board, the National Community Anti-Drug Coalitions of America National Board, and the Arkansas State Working Group for Prescription Drug Abuse Prevention.

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

In addition, I am the Region IV representative of the National Association of State Alcohol and Drug Abuse Directors.

2. I am over 18 years of age and competent to make this declaration. All the facts set forth in this declaration are offered to the best of my knowledge, information, and belief based on my personal knowledge and professional experience and my review of various records maintained by the Office of State Drug Director.

3. As the Arkansas Drug Director, I oversee the Arkansas Naloxone Saves Program, which currently has a federal grant as its sole source of funding. In my role overseeing the Naloxone Saves Program, I directed my office to track the efficacy and reach of the program by compiling data regarding drug overdose deaths and saves from naloxone in the State of Arkansas. My office regularly maintains and updates this data in the ordinary course of business.

4. In my capacity as Arkansas Drug Director, I also commissioned my office to compile the Naloxone Saves Program Report (“**Report**”) from this data that it regularly keeps. The Report is attached to this declaration as **Exhibit 1**.

5. I disseminated the Report to other government officials, journalists, and Arkansas citizens to provide information on the activities of the Office of State Drug Director and, in particular, the Naloxone Saves Program. Mr. Jorgensen was one of many people to whom I sent the Report on March 9, 2021, and it is this same Report that Mr. Jorgensen attached as an exhibit to his declaration.

6. The Report was not prepared in anticipation of litigation.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

EXECUTED this 5th day of November, 2021

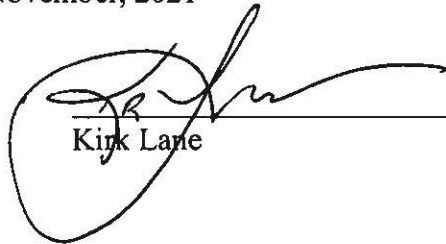

Kirk Lane

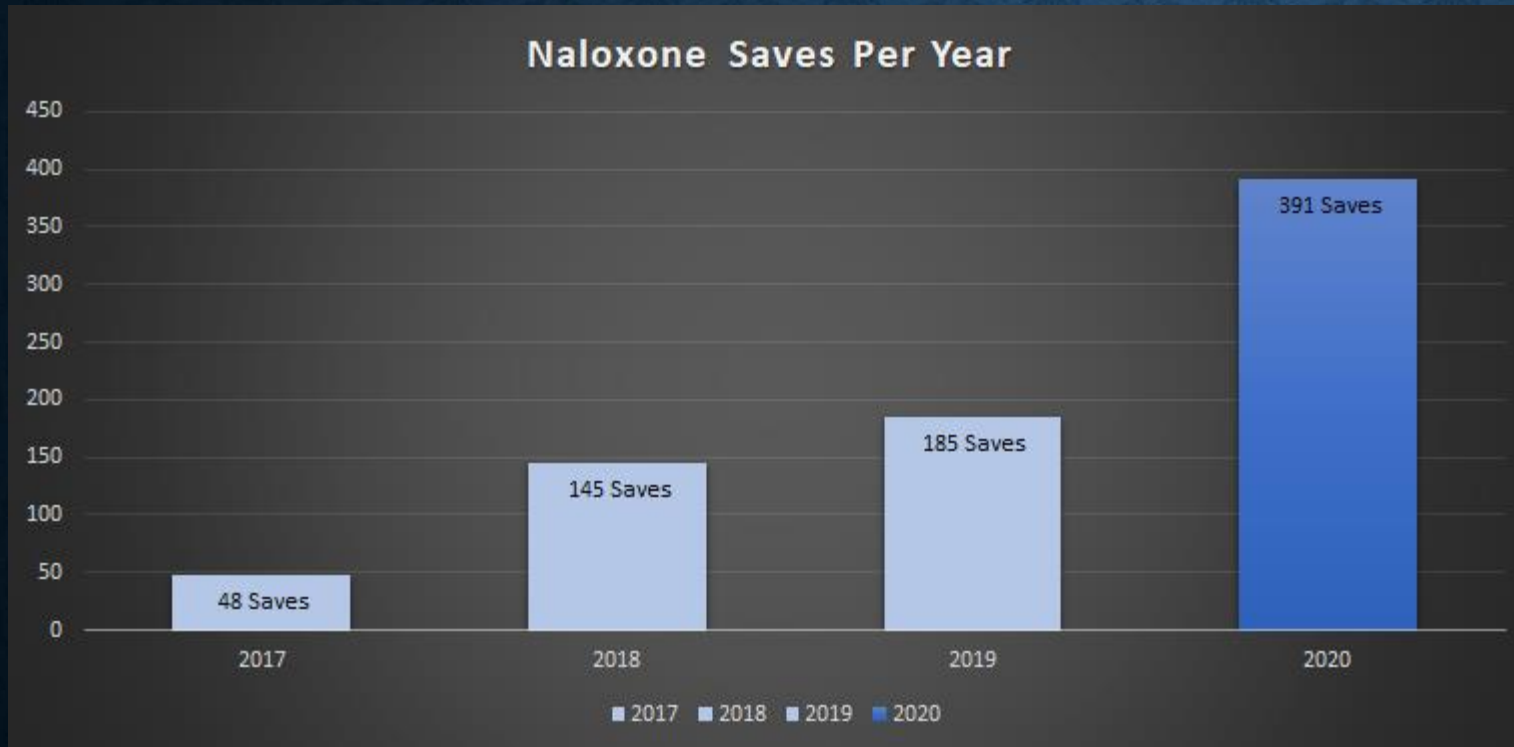
EXHIBIT 1

Office of State
Drug Director



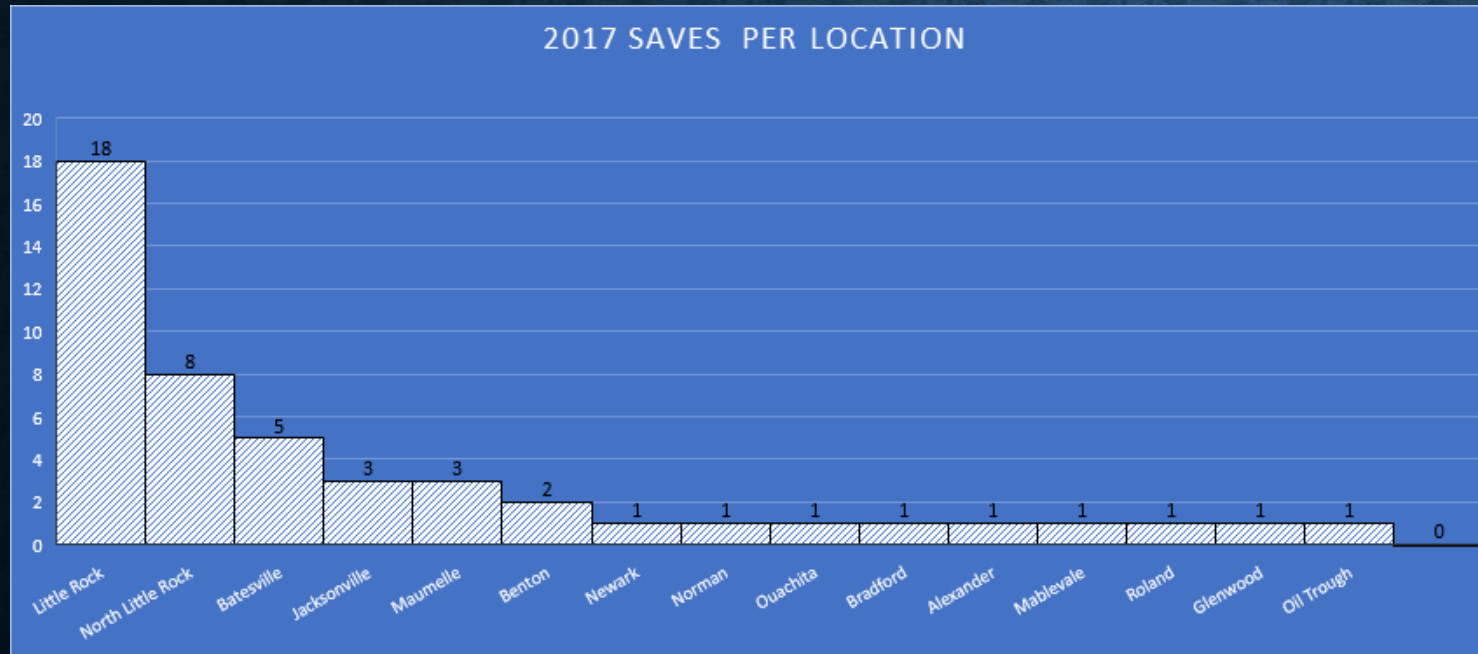
ARKANSAS NALOXONE SAVES PROGRAM REPORT

- The Arkansas Naloxone Program was developed to train and equip first responders in communities with life-saving naloxone to stop an opioid overdose. It is the result of number of Federal, State and Corporate funding opportunities, along with a great partnership with the Criminal Justice Institute (CJI). First responders consist of Law Enforcement, Fire, EMS, Treatment and Recovery Center personnel, and School Nurses, all of which have a high propensity to come into contact with those that may be experiencing an opioid overdose. The program also trains community members on health literacy regarding opioids and provides the NARCANSAS app to all Arkansans



- 2017 – 48 lives saved
- 2018 – 145 lives saved
- 2019 – 185 lives saved
- 2020 – 391 lives saved
- Total of 769 lives saved

2017 SAVES PER LOCATION



2017 - 48 lives saved from overdose

Top 5 Location Breakdown:

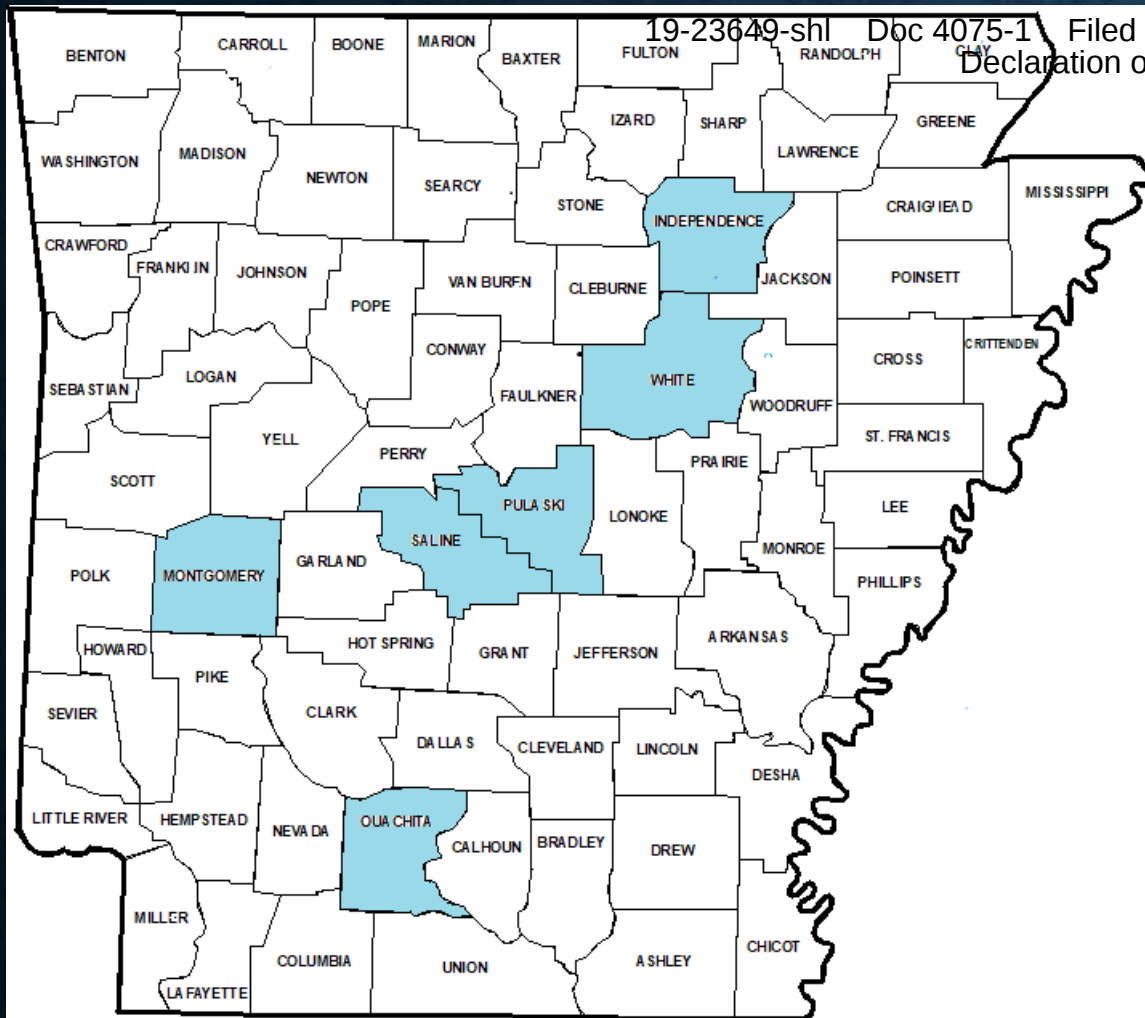
Little Rock: 18 saved

North Little Rock: 8 saved

Batesville: 5 saved

Jacksonville: 3 saved

Maumelle: 3 saved



Pulaski County – 36 saves

Independence County – 7 saves

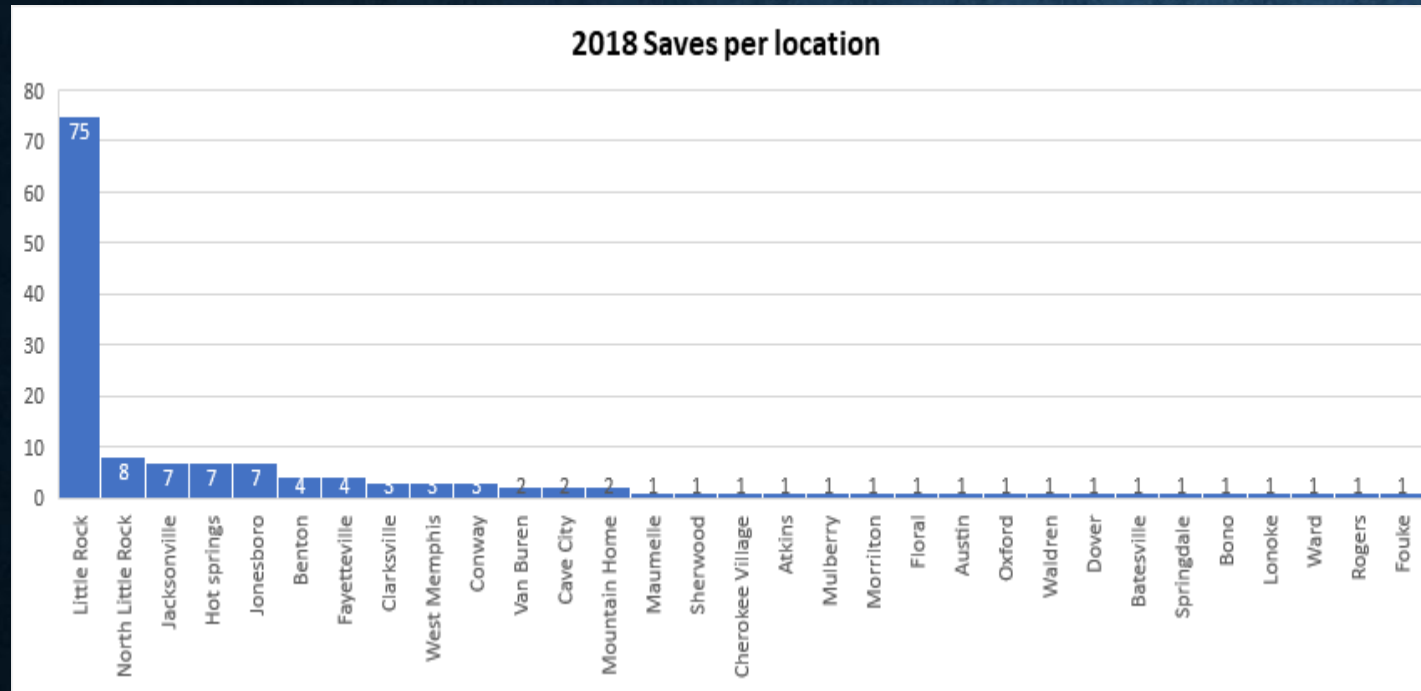
Montgomery County – 2 saves

Ouachita County – 1save

Saline County – 1 save

White County – 1 save

2017 SAVES BY COUNTY



2018 - 145 lives saved from overdose

Top 5 Location Breakdown:

Little Rock: 75 saved

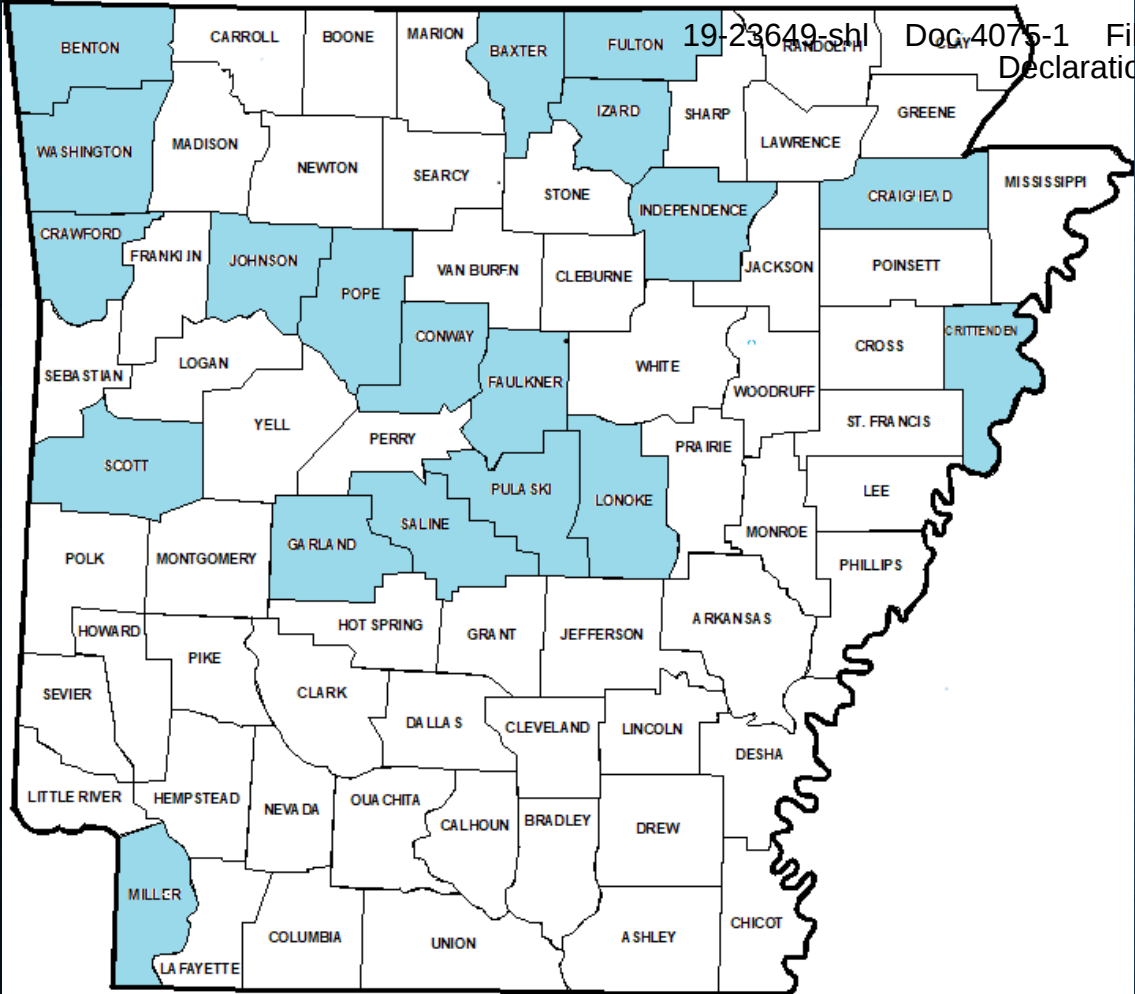
North Little Rock: 8 saved

Jacksonville: 7 saved

Hot Springs: 7 saved

Jonesboro: 7 saved

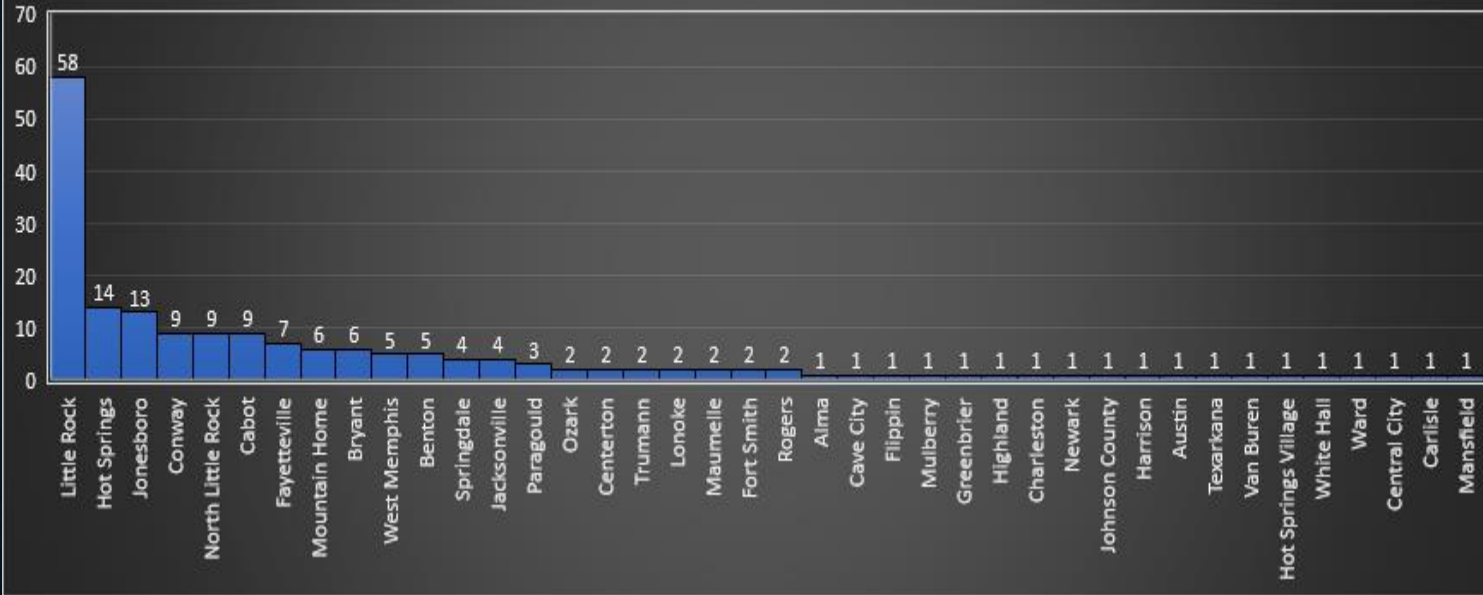
2018 SAVES PER LOCATION



- Crawford – 3 saves
- Pulaski – 92 saves
- Craighead – 8 saves
- Garland – 7 saves
- Saline – 4 saves
- Washington – 4 saves
- Independence – 4 saves
- Johnson – 3 saves
- Crittenden – 3 saves
- Benton – 2 saves
- Pope – 2 saves
- Faulkner – 3 saves
- Lonoke – 3 saves
- Fulton – 1 save
- Conway – 1 save
- Izard – 1 save
- Scott – 1 save
- Miller – 1 save

2018 SAVES BY COUNTY

2019 Saves by Location



2019 - 185 lives saved from overdose

Top 5 Location Breakdown:

Little Rock: 58 saved

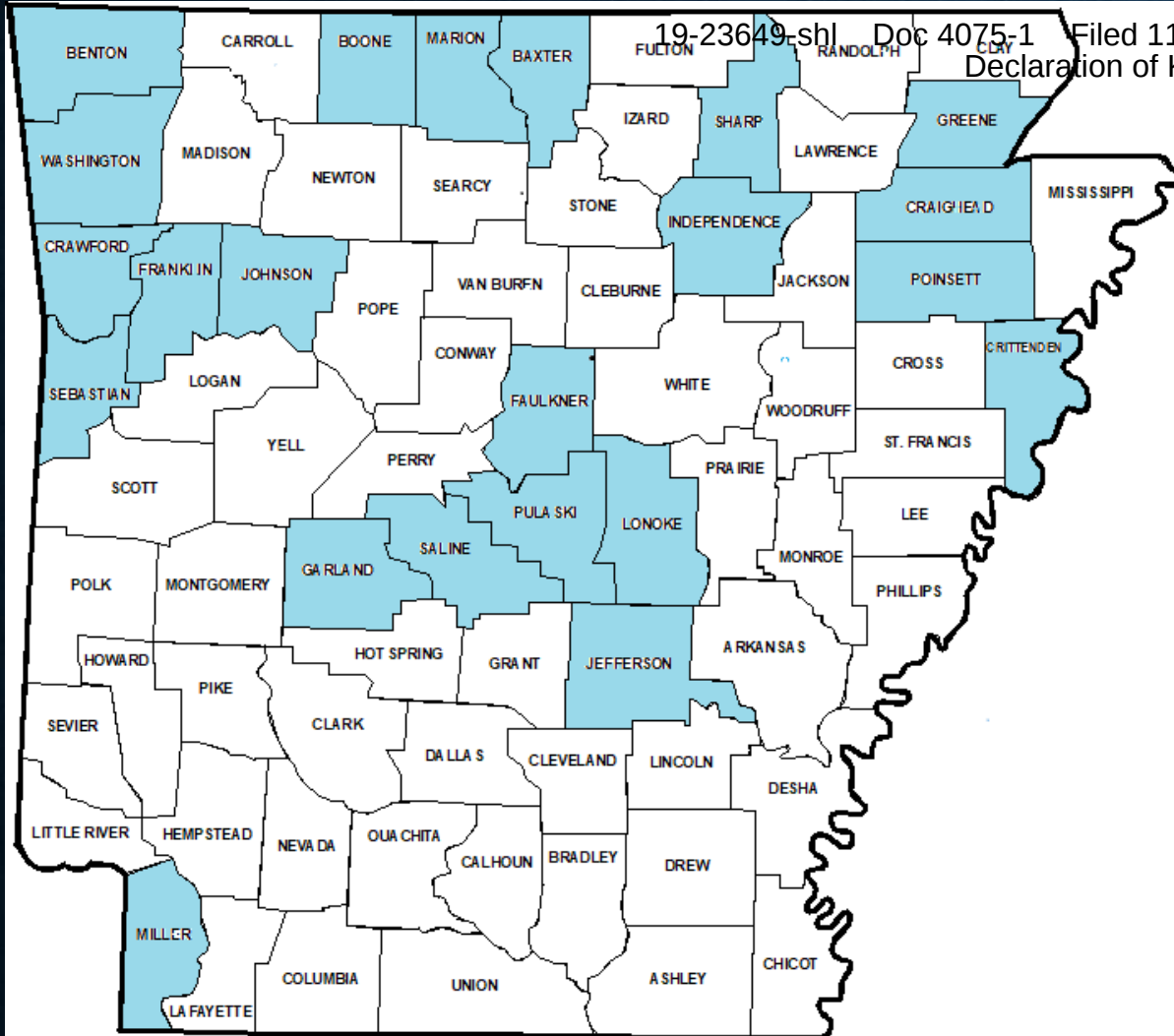
Jonesboro: 13 saved

Hot Springs: 14 saved

Conway: 9 saved

North Little Rock: 9 saved

2019 SAVES PER LOCATION



Pulaski – 71 saves

Garland – 13 saves

Craighead – 13 saves

Faulkner – 10 saves

Saline – 11 saves

Benton – 8 saves

Washington – 7 saves

Baxter – 6 saves

Crittenden – 5 saves

Lonoke – 8 saves

Franklin – 3 saves

Sebastian – 4 saves

Crawford – 3 saves

Greene – 3 saves

Independence – 2 saves

Marion – 1 save

Boone – 1 save

Poinsett – 2 save

Johnson – 1 save

Miller – 1 save

Jefferson – 1 save

2019 SAVES BY COUNTY

2020 - 369 lives saved from overdose

Top 5 Location Breakdown:

Little Rock: 96 saved

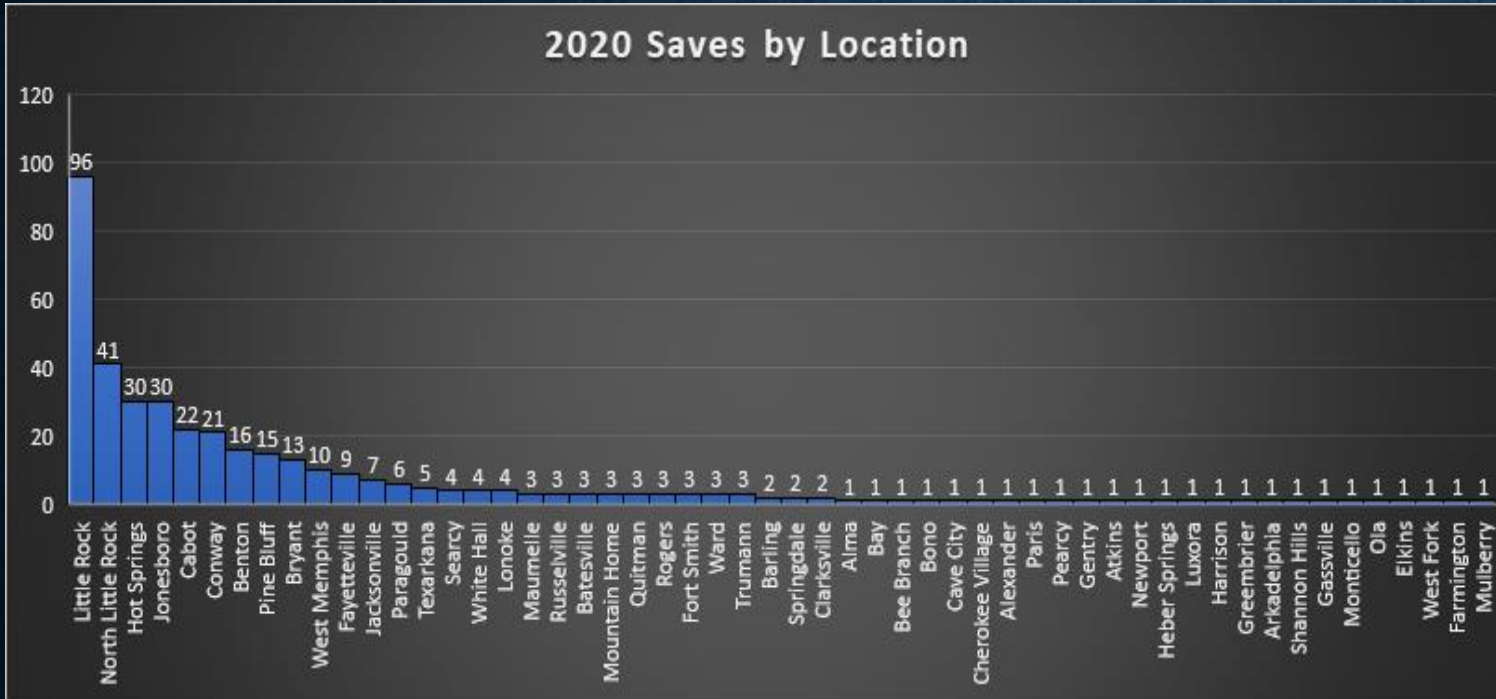
North Little Rock: 41 saved

Hot Springs: 30 saved

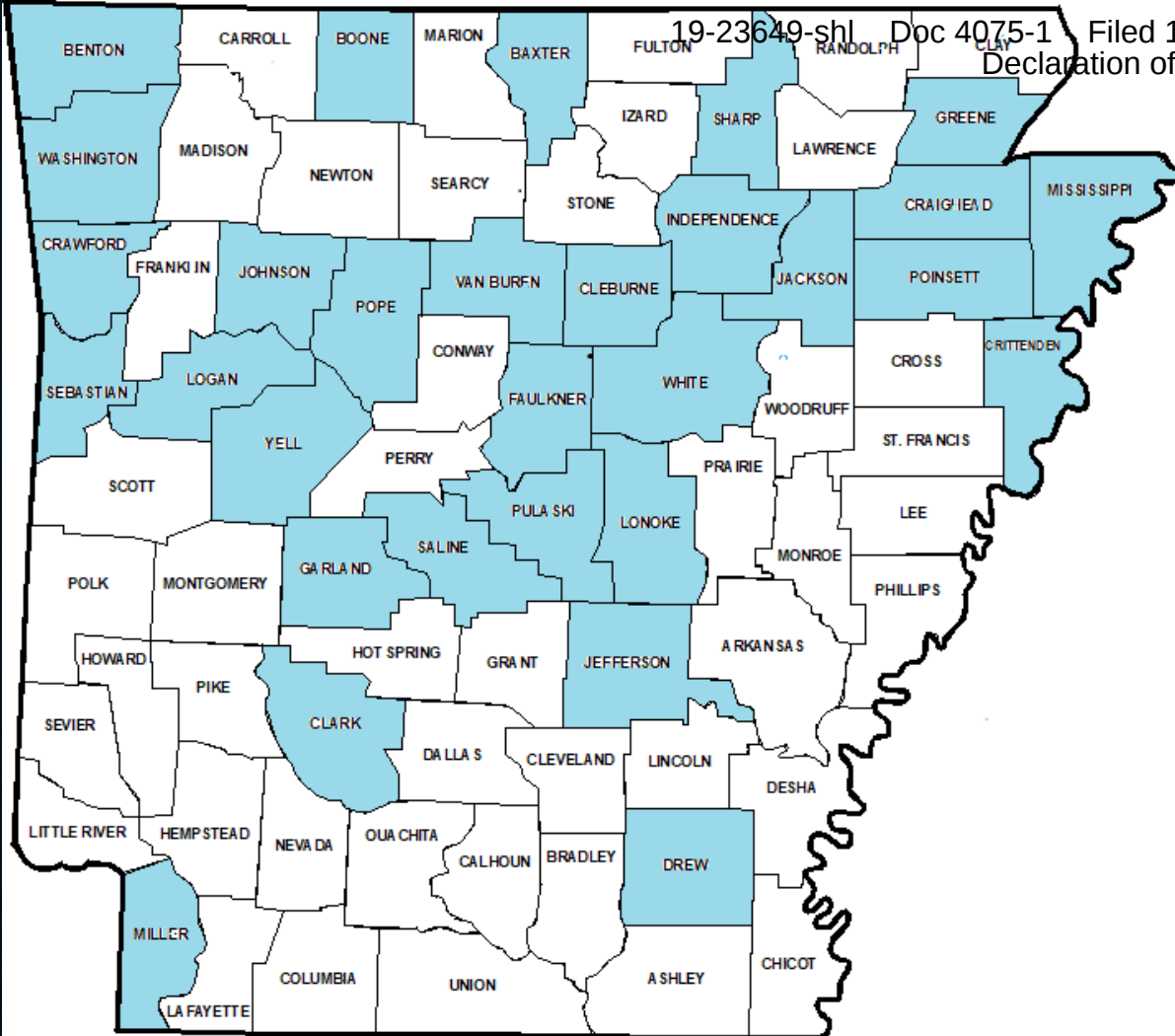
Jonesboro: 30 saved

Cabot: 22 saved

2020 Saves by Location



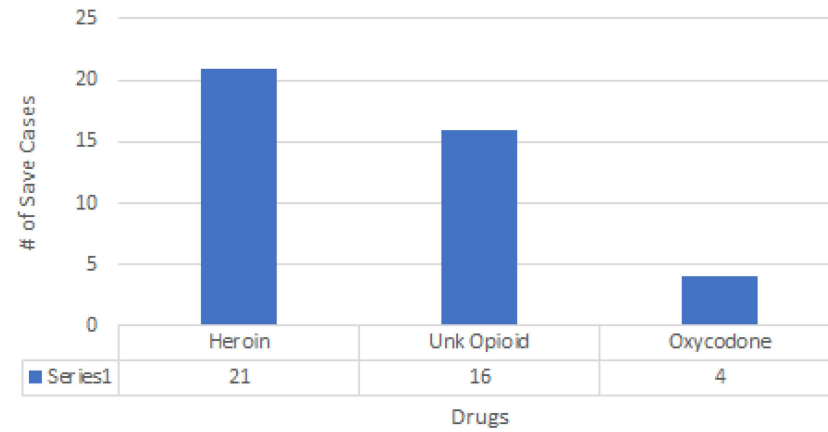
2020 SAVES PER LOCATION



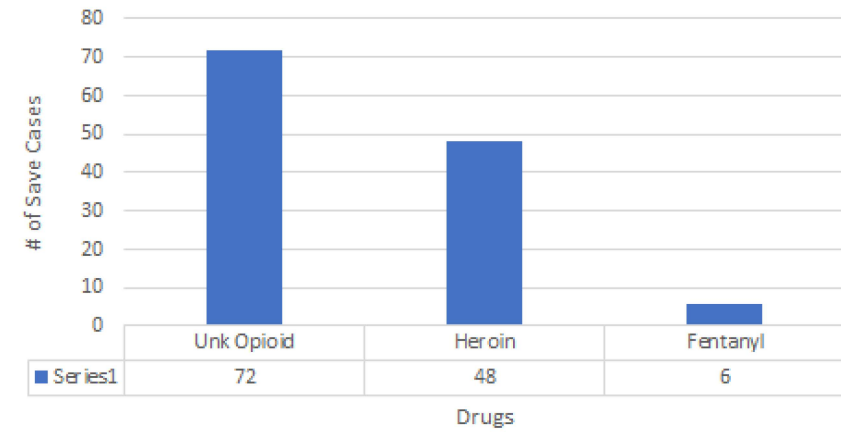
2020 SAVES BY COUNTY

Pulaski – 49 saves	Benton – 3 saves
Craighead – 33 saves	Poinsett – 3 saves
Garland – 32 saves	Sebastian – 5 saves
Saline – 31 saves	Crawford – 2 saves
Lonoke – 29 saves	Johnson – 2 saves
Faulkner – 23 saves	Sharp – 2 saves
Jefferson – 18 saves	Boone – 1 save
Washington – 13 saves	Clark – 1 save
Crittenden – 6 saves	Cleburne – 1 save
Greene – 6 saves	Drew – 1 save
Miller – 5 saves	Jackson – 1 save
Baxter – 4 saves	Logan – 1 save
Independence – 4 saves	Mississippi – 1 save
Pope – 4 saves	Van Buren – 1 save
White – 4 saves	Yell – 1 save

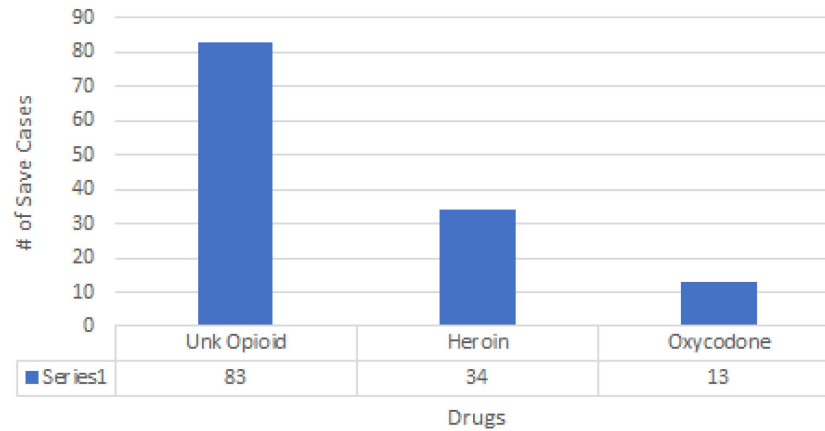
2017 Top 3 Drugs (as reported in Save Reports)



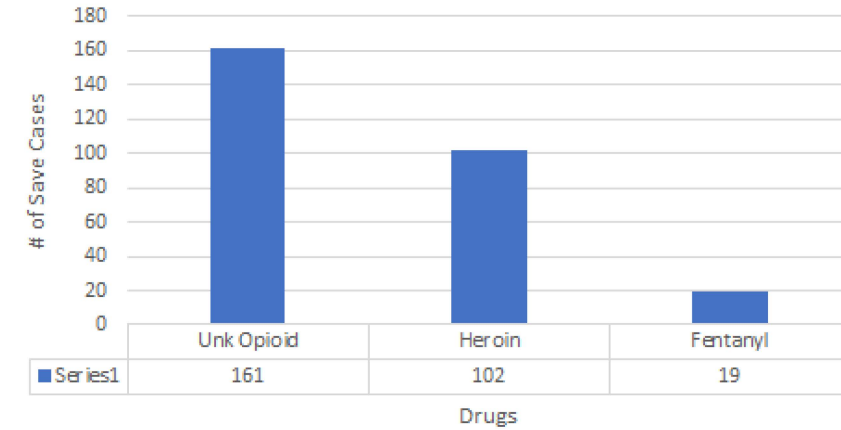
2018 Top 3 Drugs (as reported in Save Reports)



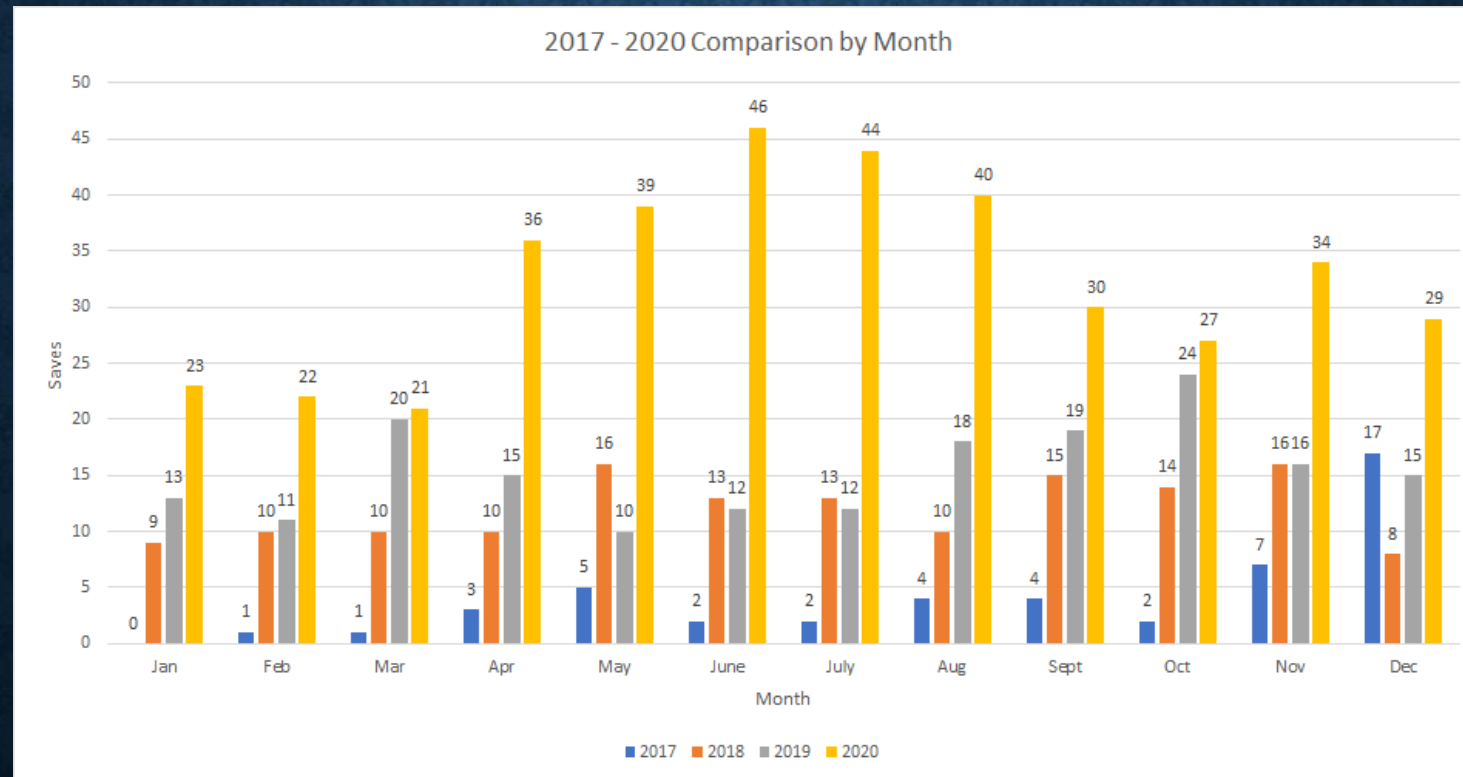
2019 Top 3 Drugs (as reported in Save reports)



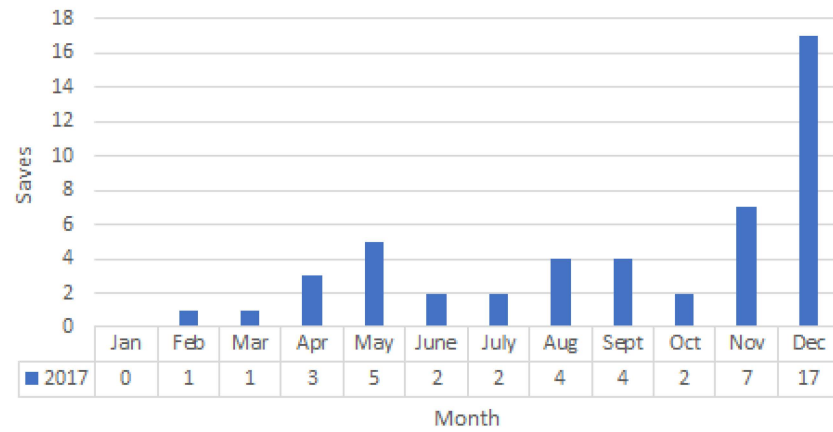
2020 Top 3 Drugs (as reported in Save Reports)



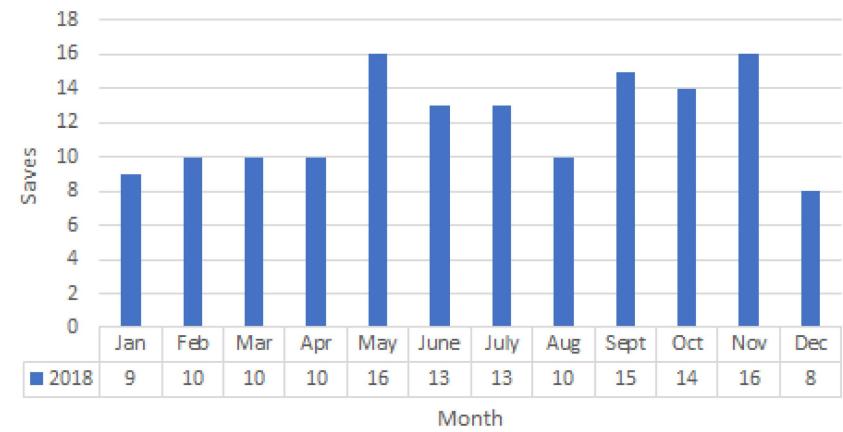
OVERALL BREAKDOWN BY MONTH



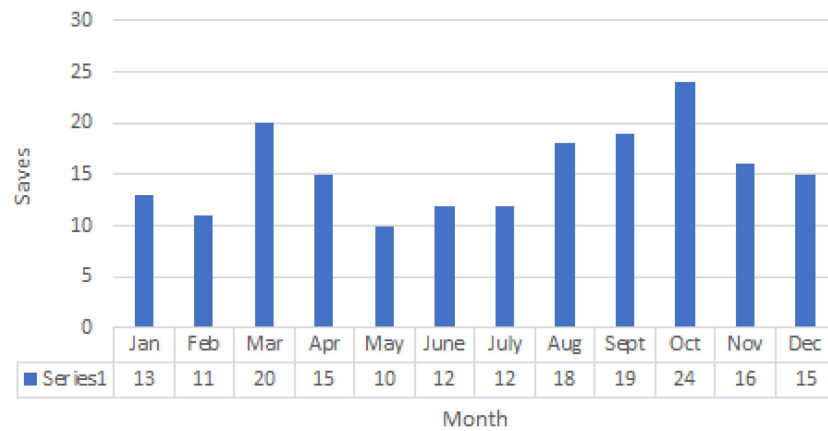
2017 Saves by Month



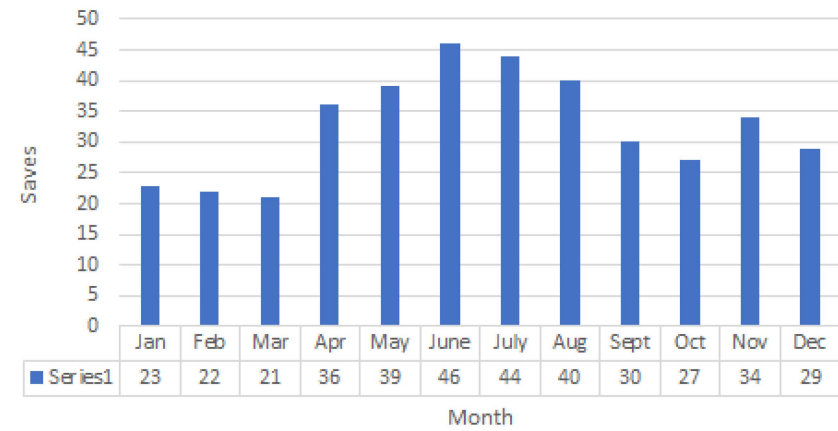
2018 Saves by Month



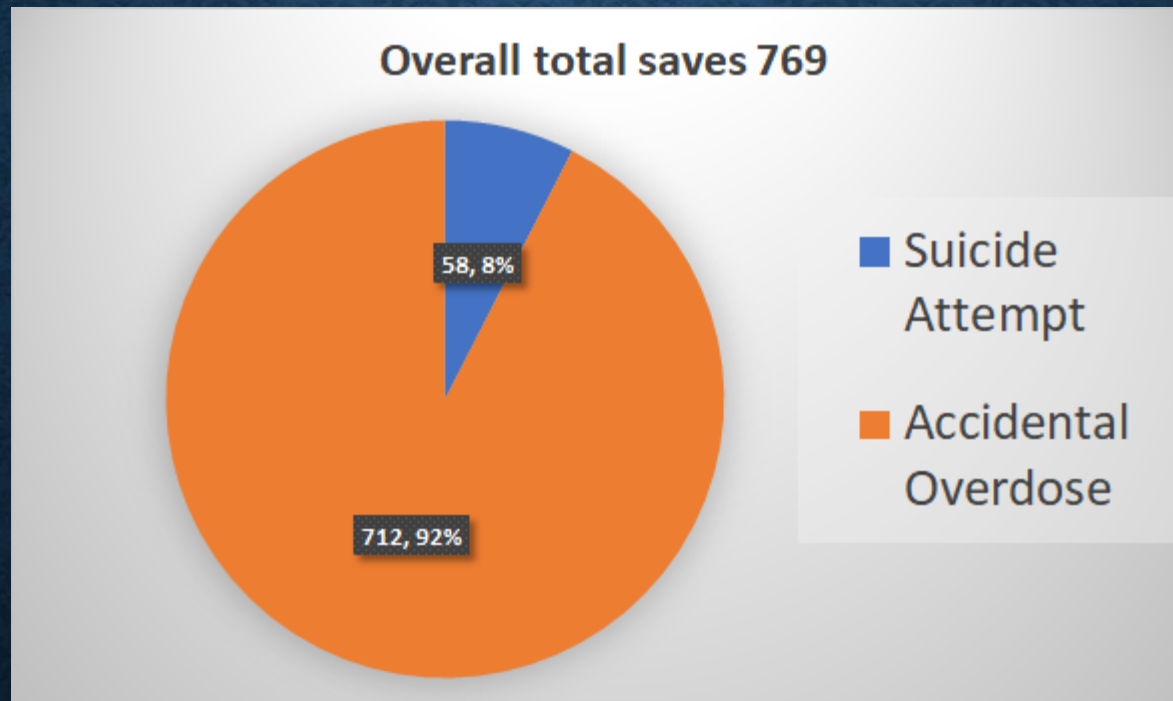
2019 Saves by Month

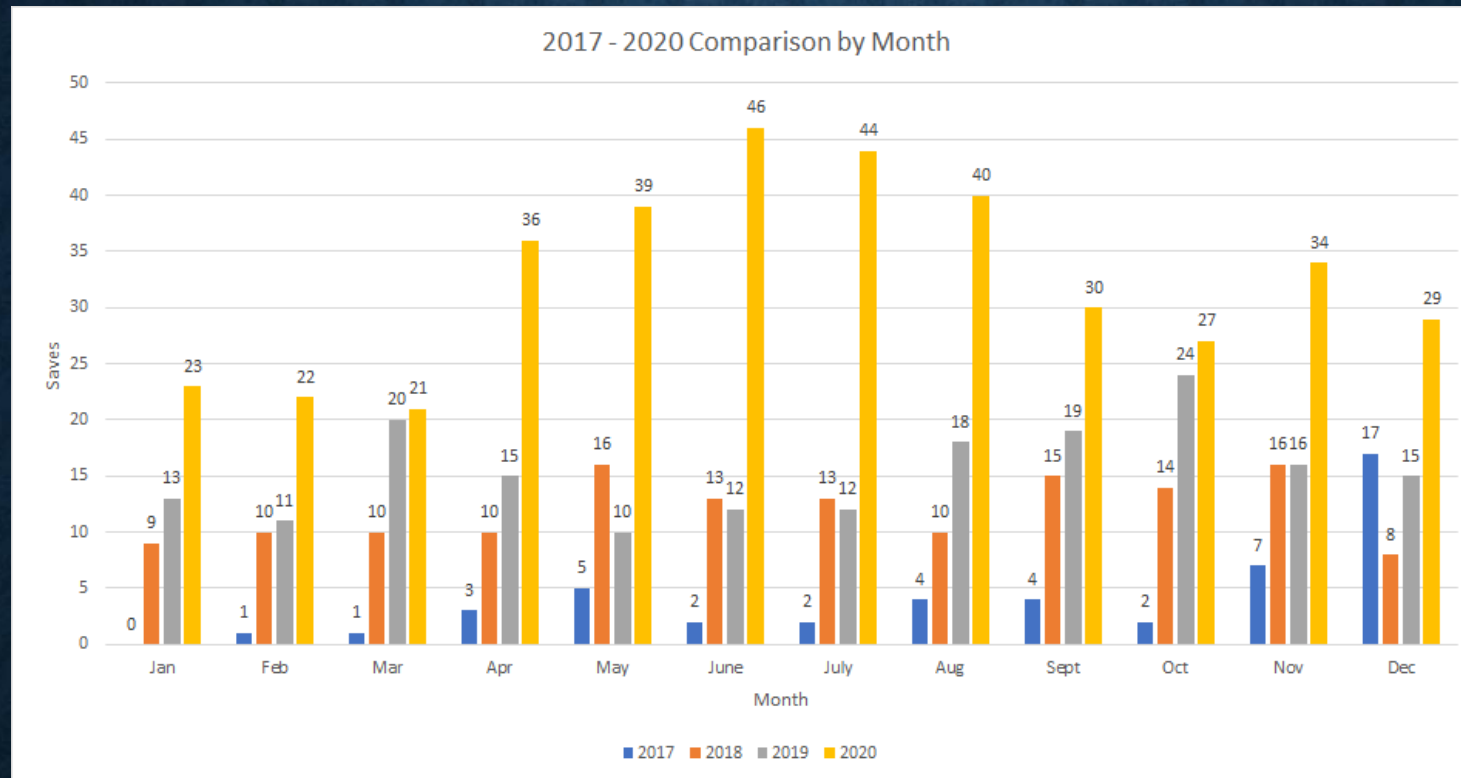


2020 Saves by Month



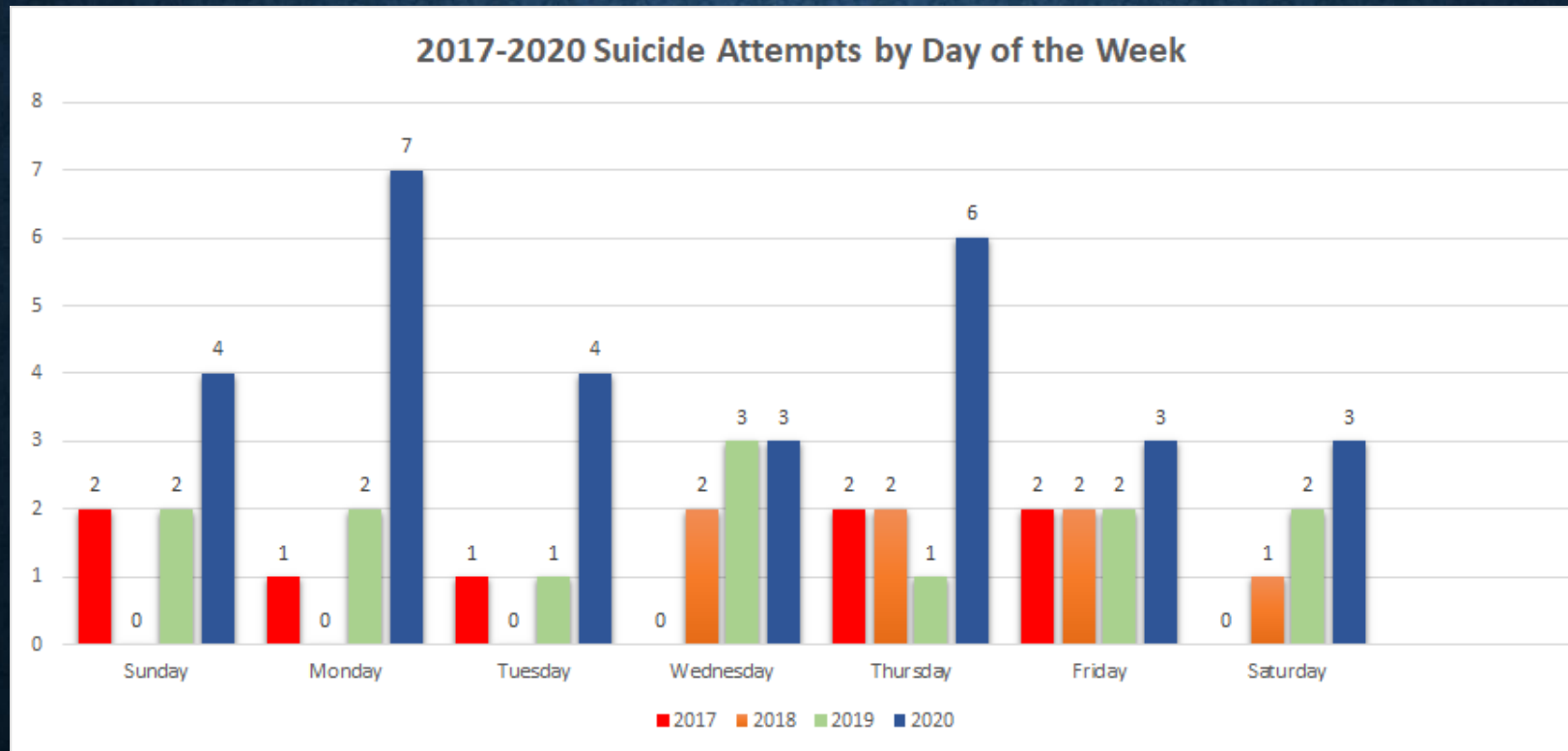
SUICIDE ATTEMPT DATA:



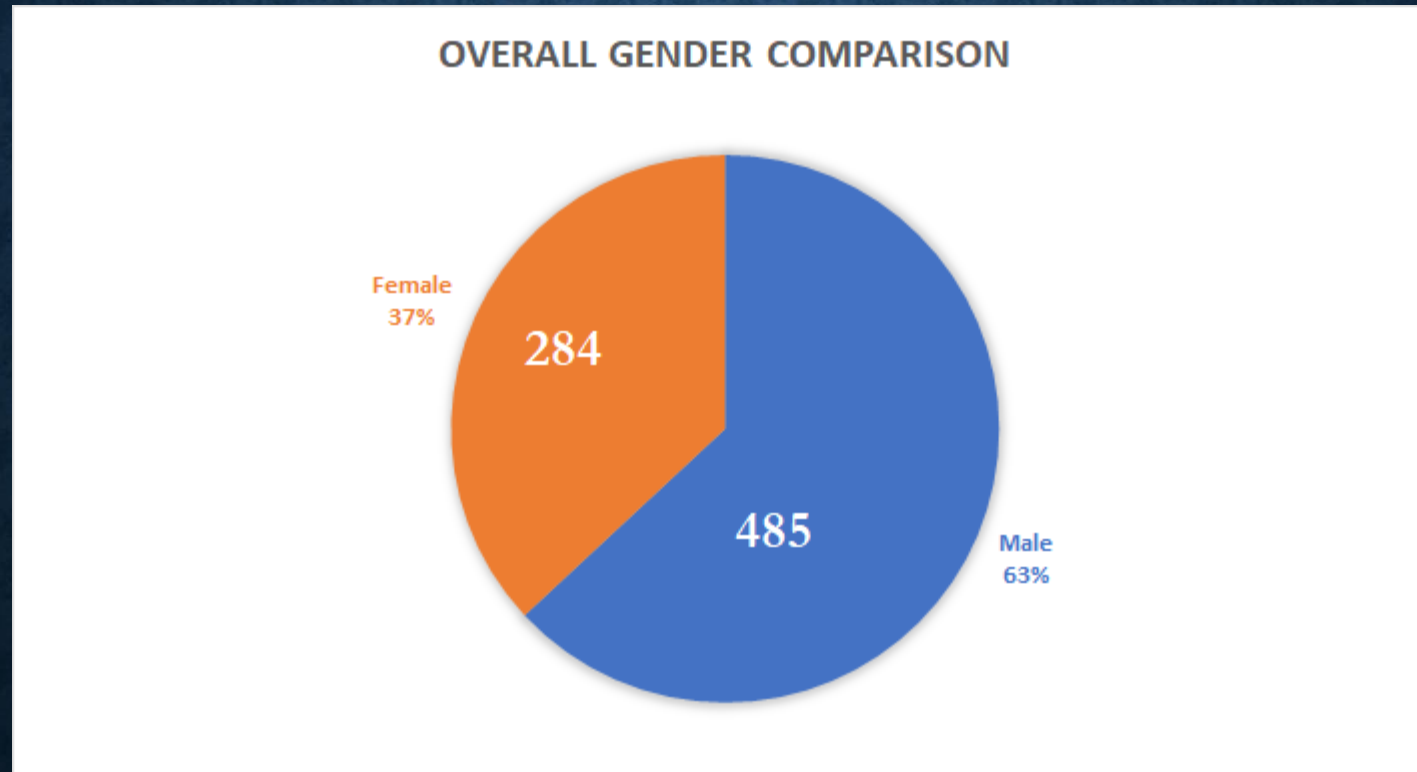


2017 - 2020 MONTHLY COMPARISON: SUICIDE ATTEMPT OVERDOSES

2017 - 2020 WEEKDAY COMPARISON: SUICIDE ATTEMPT OVERDOSES



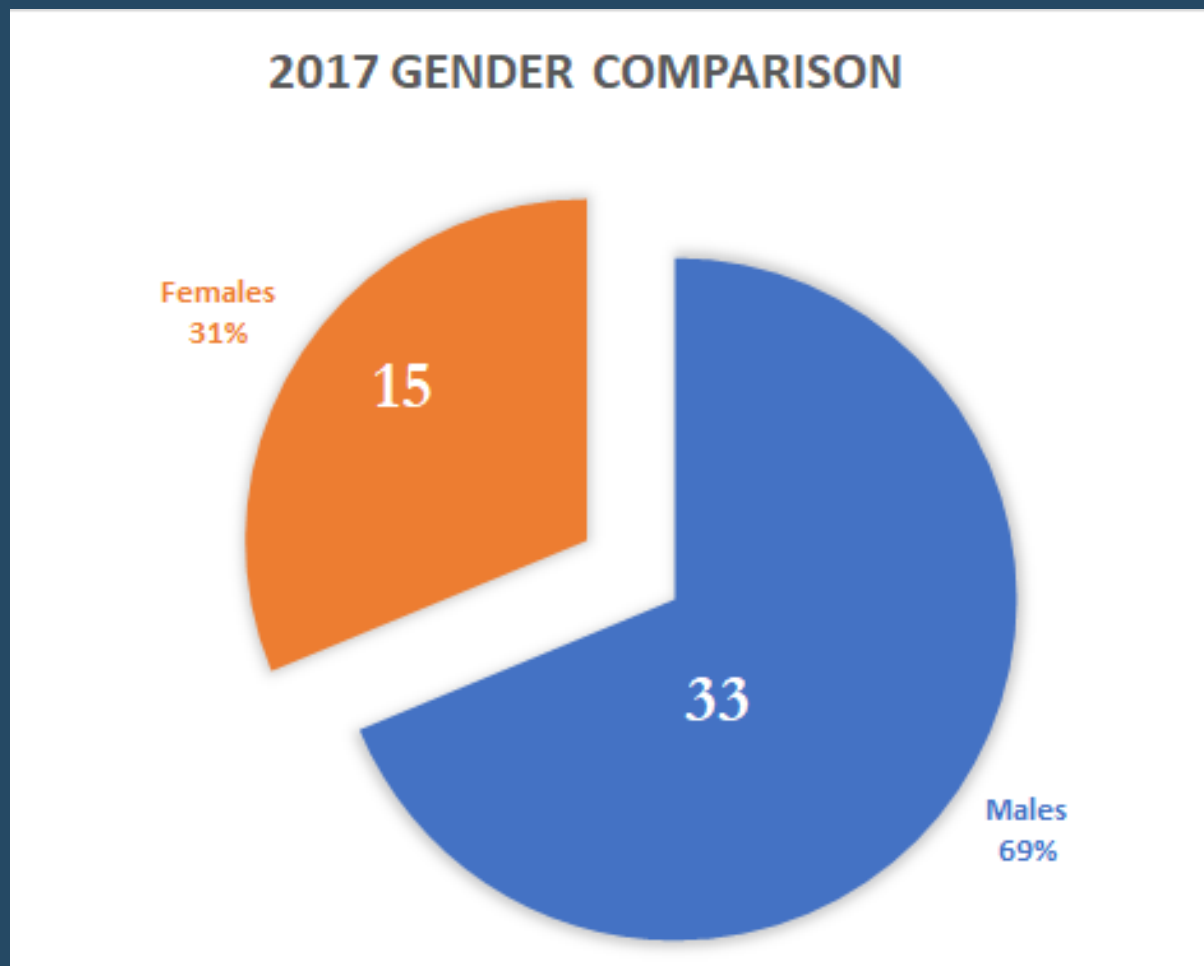
GENDER DATA:



2017 Saves by Gender:

Total saves = 48

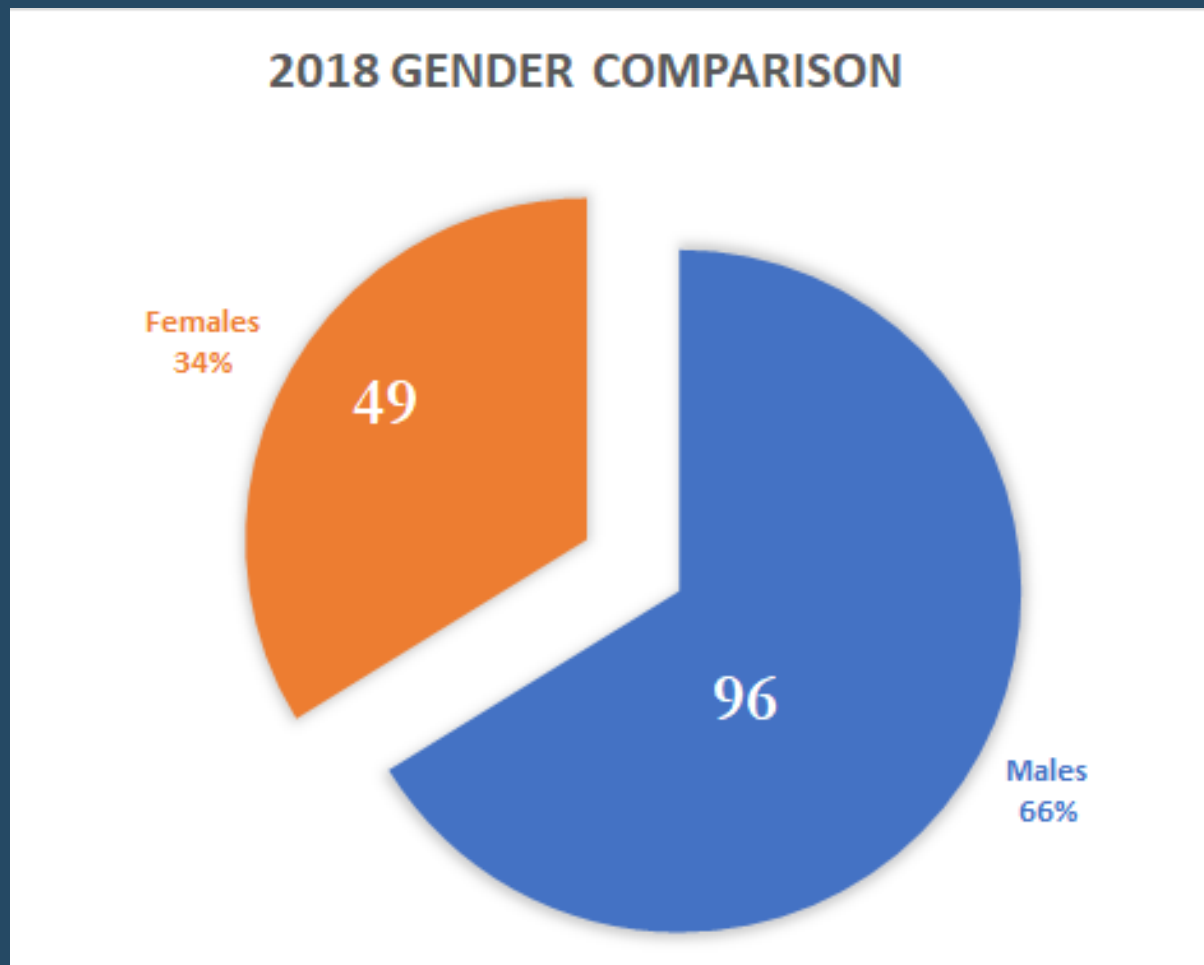
- Males saved: 33 (69%)
- Female saved: 15 (31%)



2018 Saves by Gender:

Total saves = 145

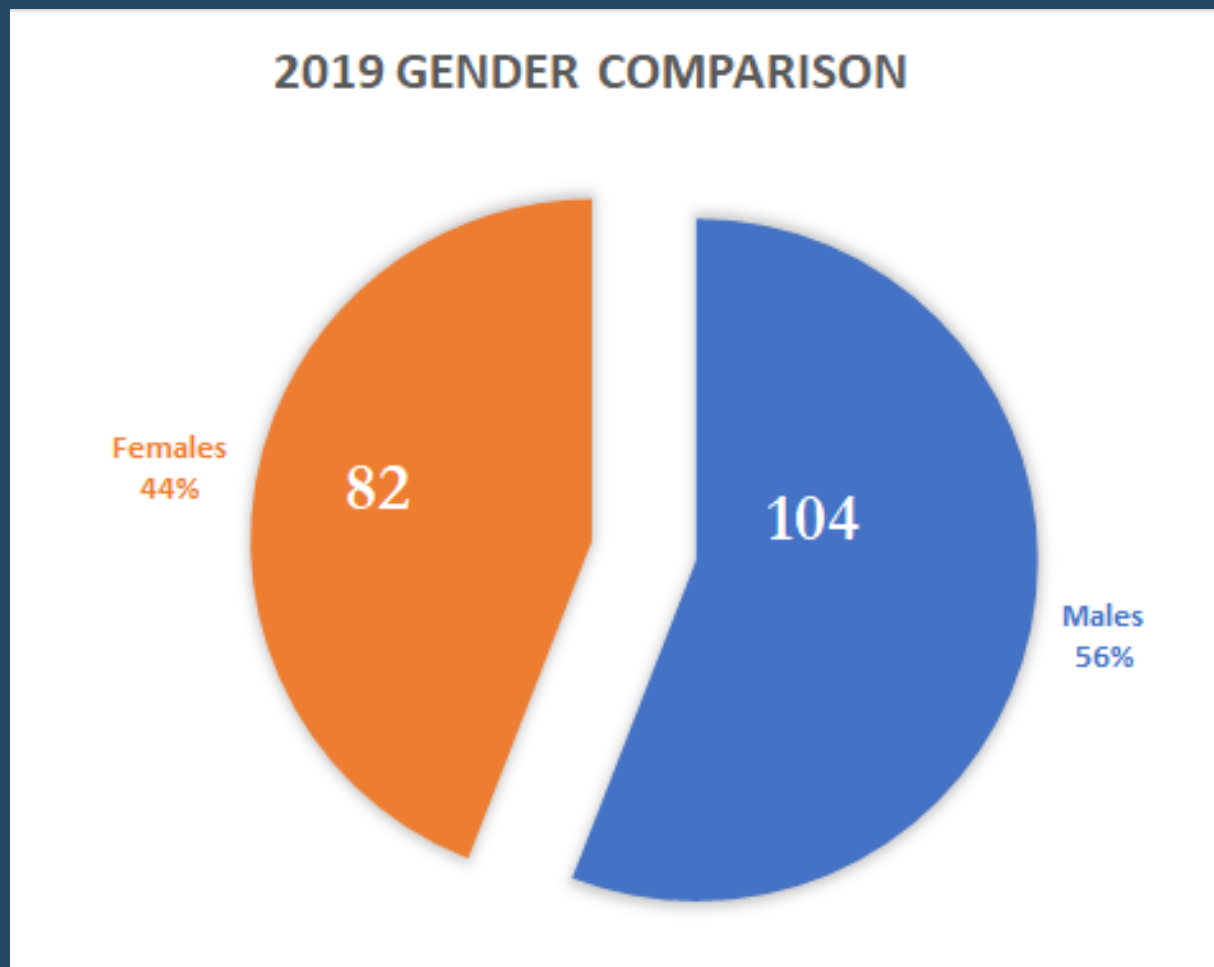
- Males saved: 96 (66%)
- Female saved: 49 (34%)



2019 Saves by Gender

Total saves = 185

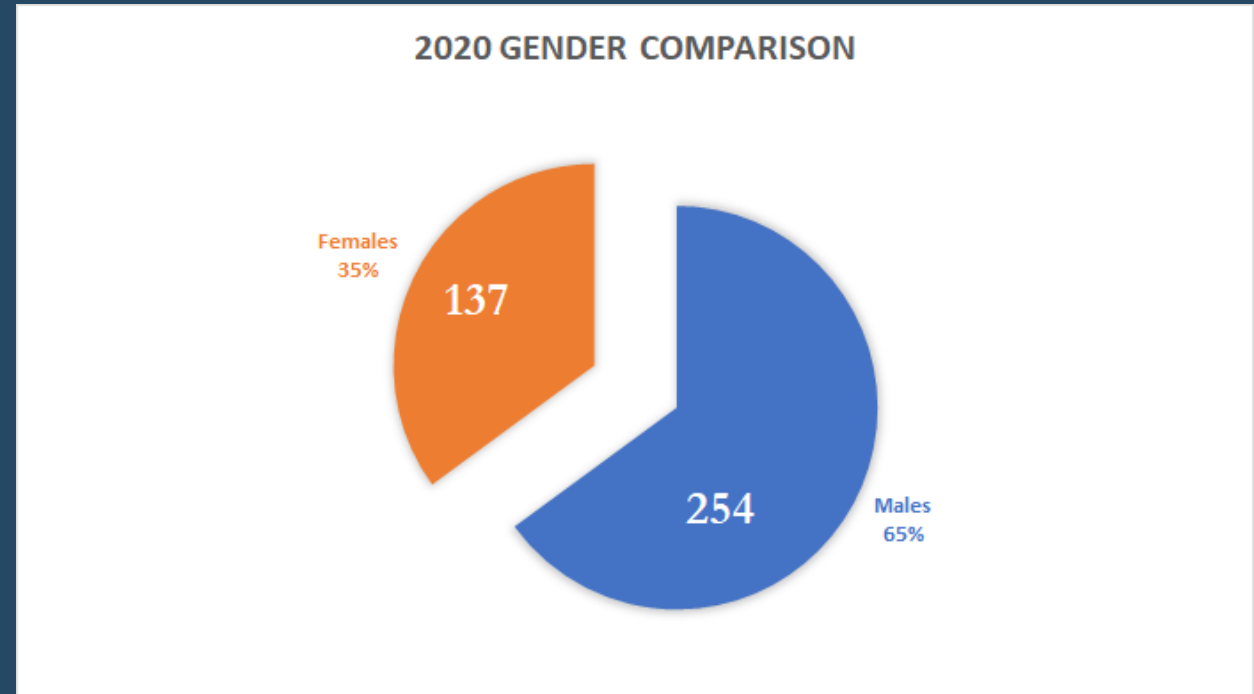
- Males saved: 104 (56%)
- Females saved: 82 (44%)



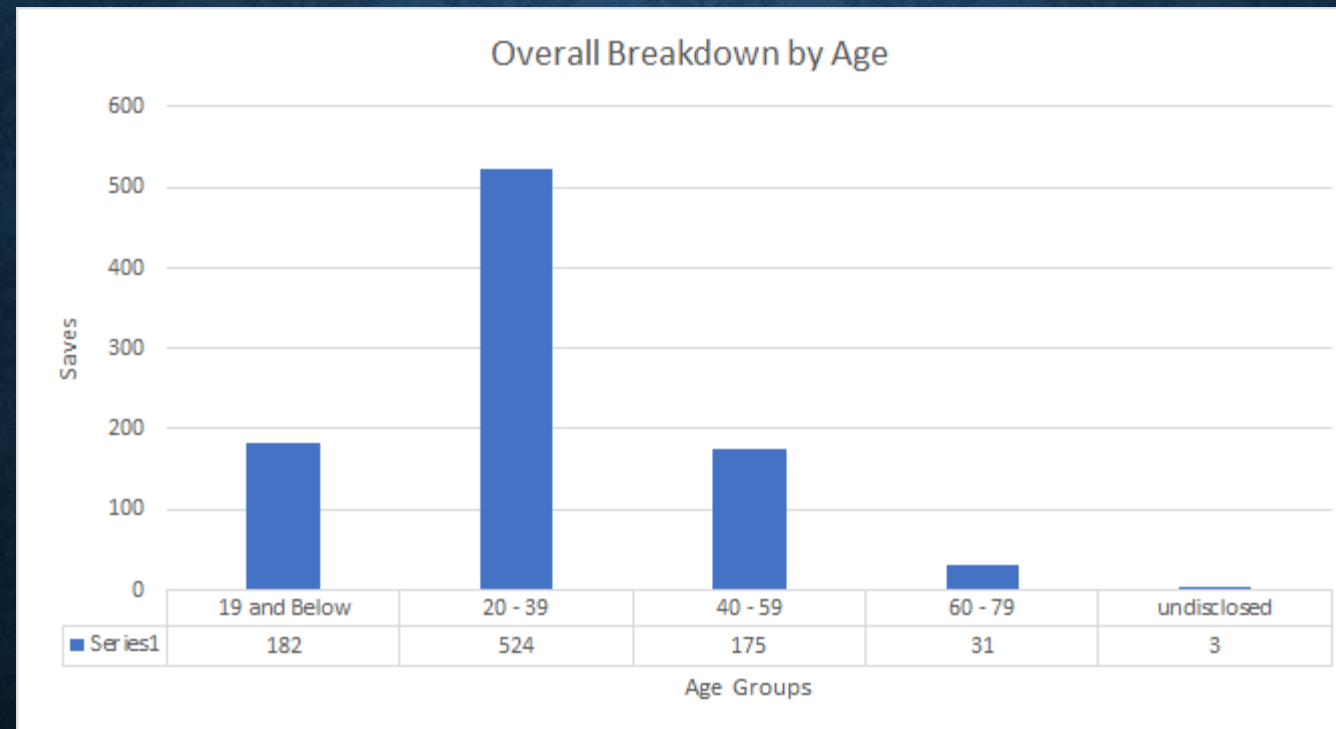
2020 Saves by Gender

Total saves = 391

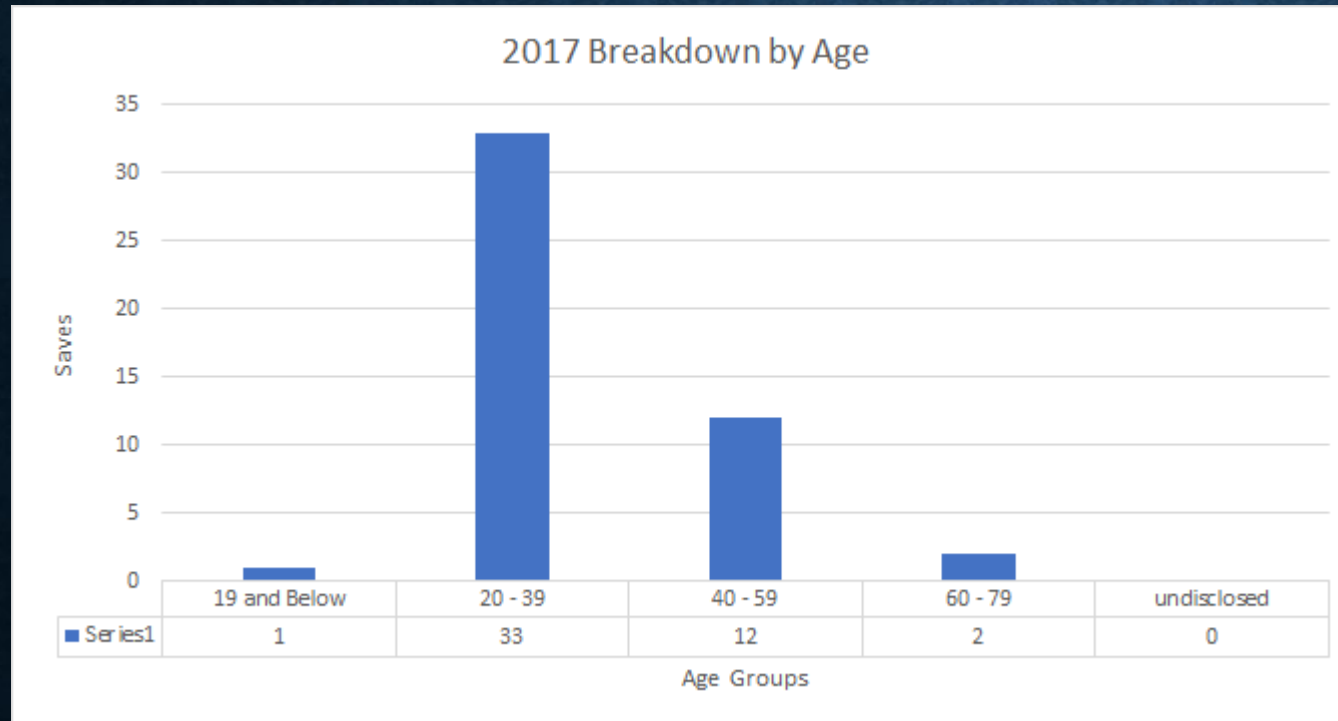
- Males saved: 254 (65%)
- Females saved: 137 (35%)



AGE DATA:



2017 BREAKDOWN BY AGE



In 2017, 48 people were saved
from an overdose death

1 was 19 or below

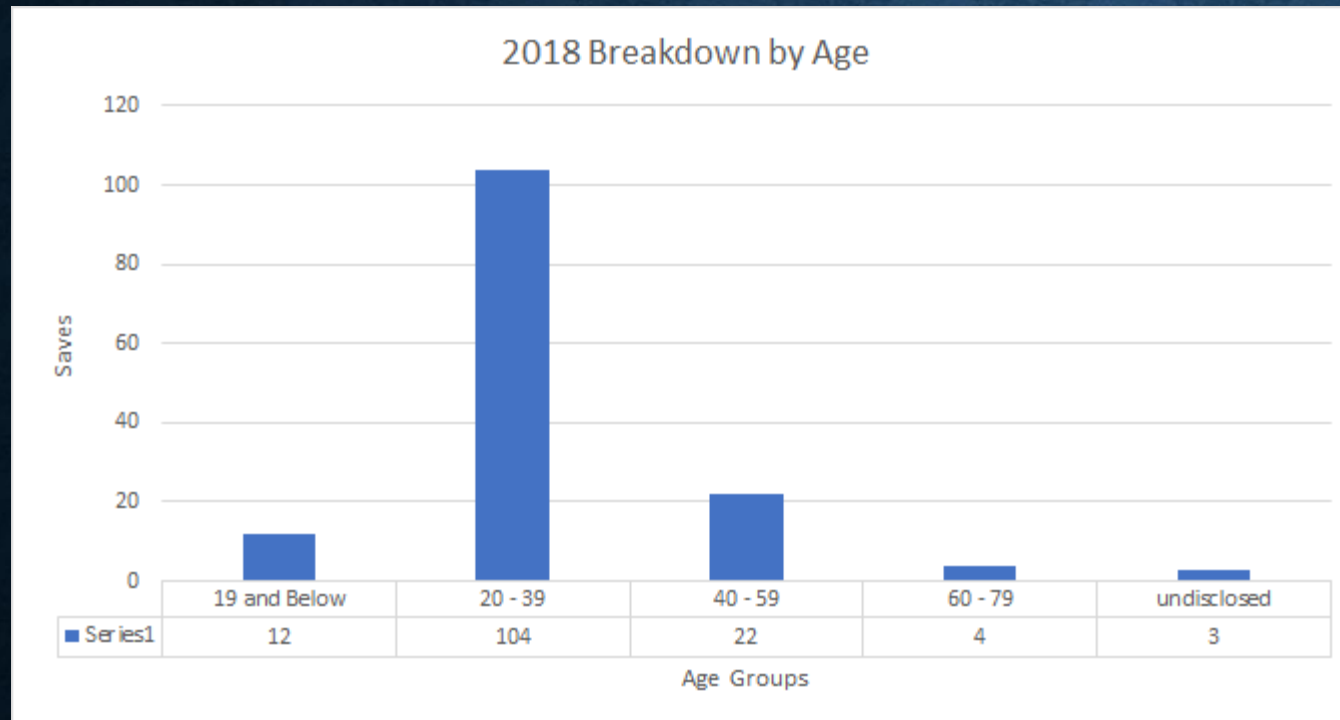
33 were 20 – 39

12 were 40 - 49

2 were 60 – 79

The youngest was 18, the oldest was 63.

2018 BREAKDOWN BY AGE



In 2018, 145 people were saved
from an overdose death

12 were 19 or below

104 were 20 – 39

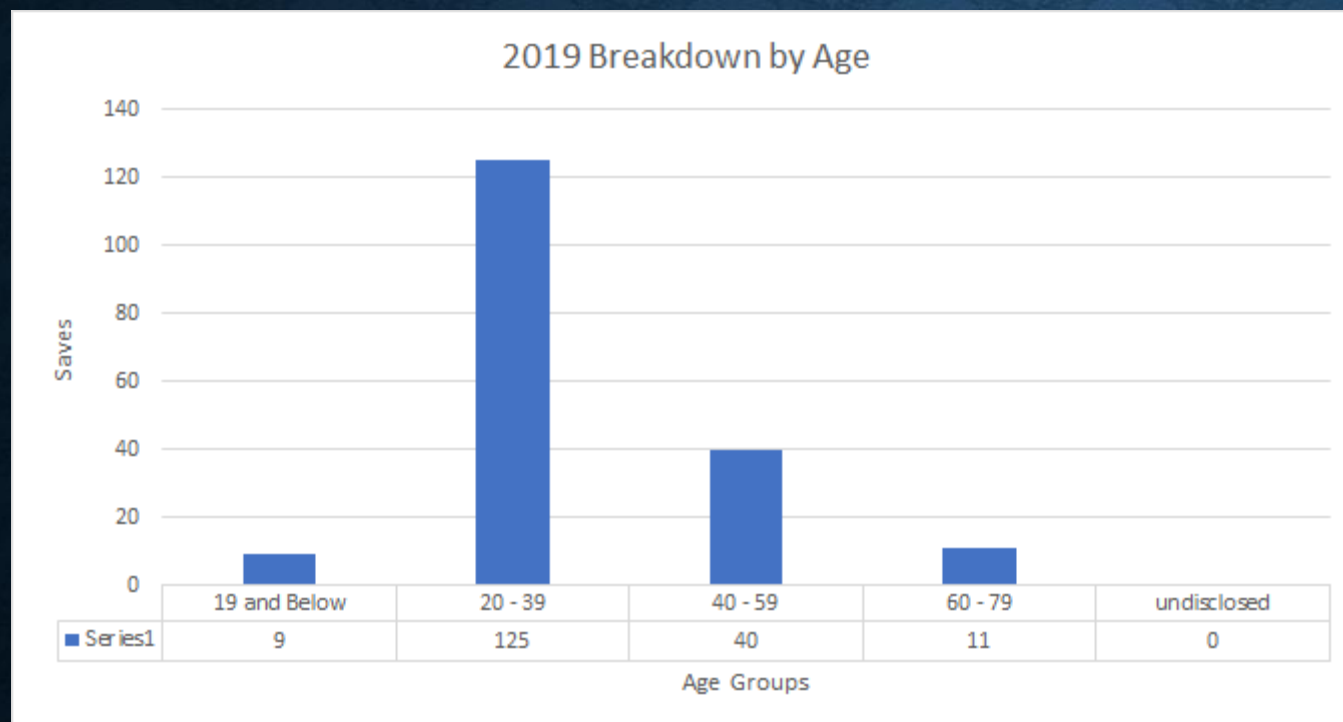
22 were 40 - 49

4 were 60 – 79

4 were undisclosed

The youngest was 12, the oldest was 63.

2019 BREAKDOWN BY AGE



In 2019, 185 people were saved
from an overdose death

9 were 19 or below

125 were 20 – 39

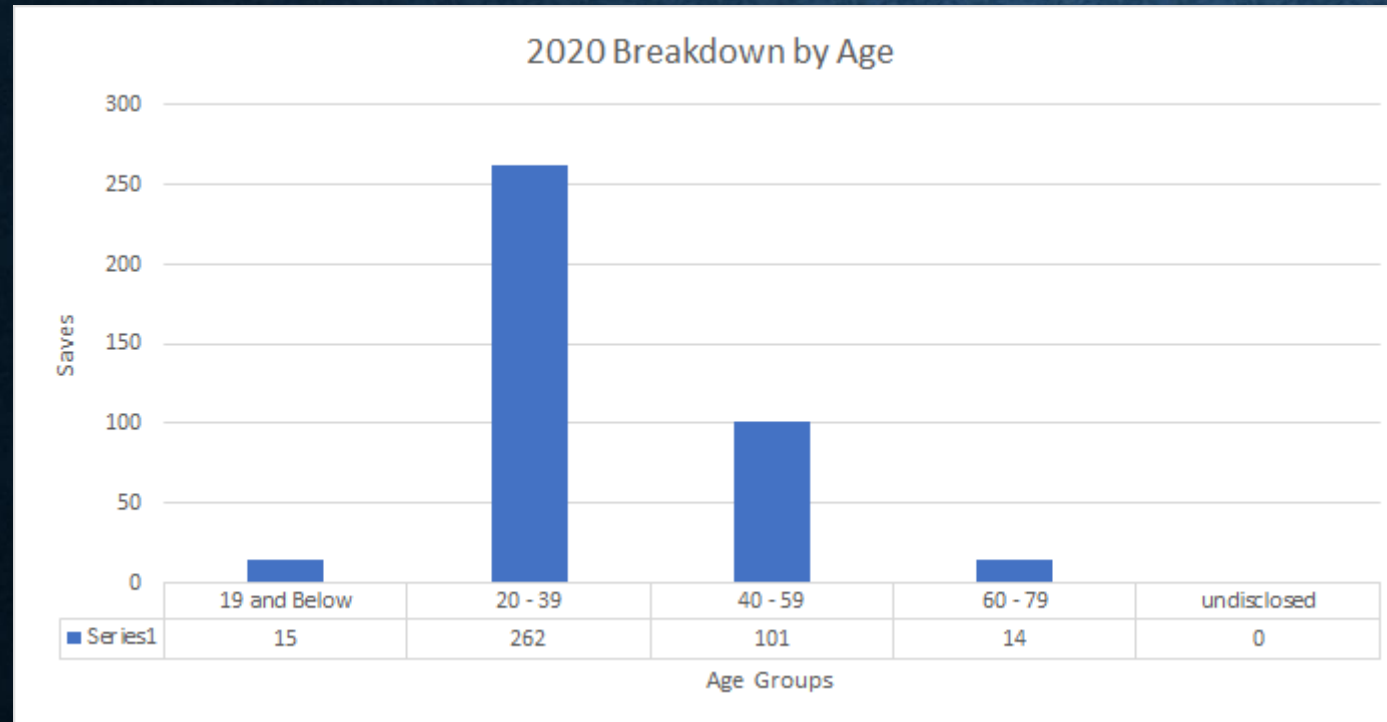
40 were 40 - 49

11 were 60 – 79

0 were undisclosed

The youngest was 15, the oldest was 77.

2020 BREAKDOWN BY AGE



In 2020, 391 people were saved from an overdose death

15 were 19 or below

262 were 20 – 39

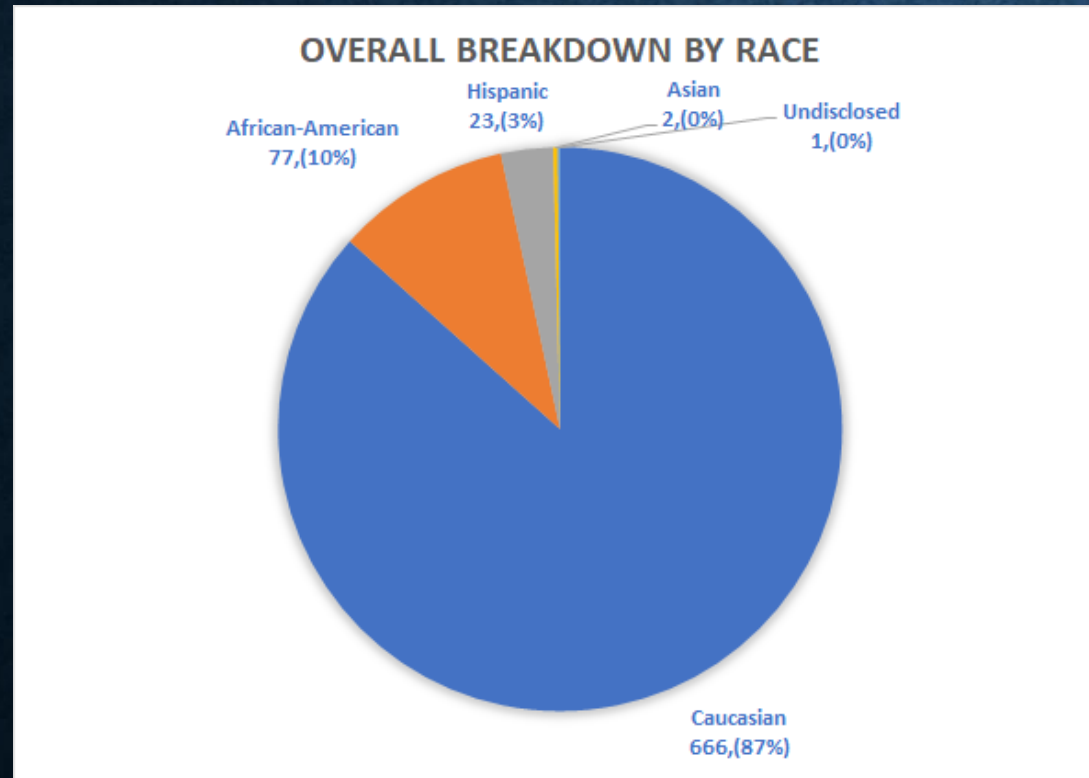
101 were 40 - 49

14 were 60 – 79

0 was undisclosed

The youngest was 13, the oldest was 80.

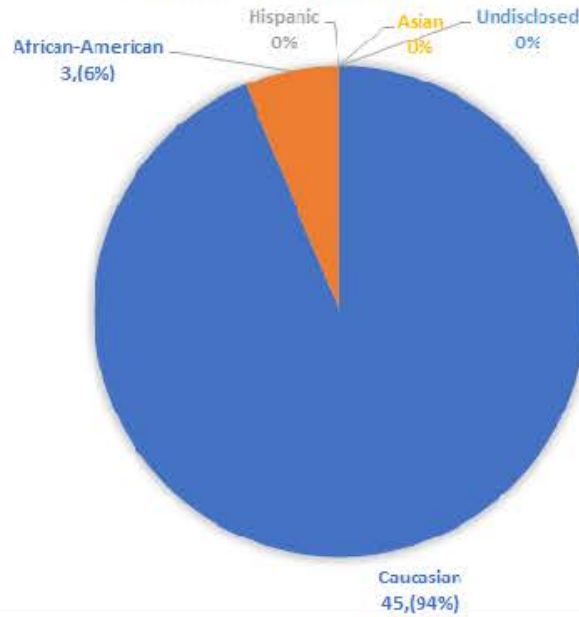
RACE DATA:



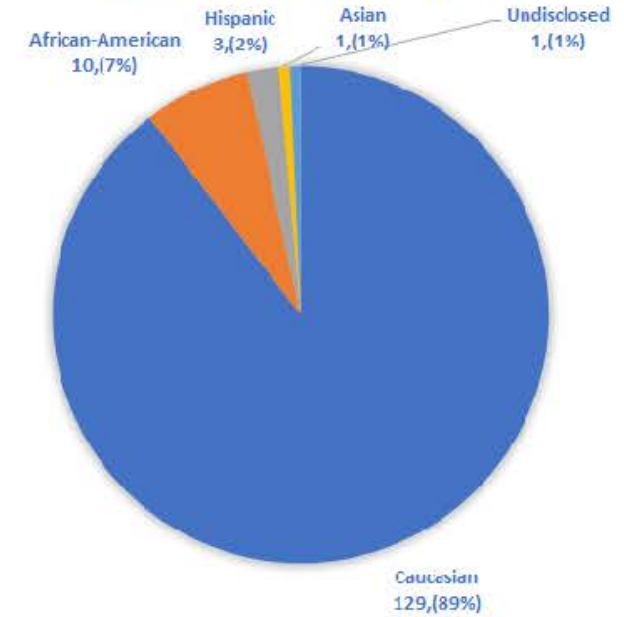
Breakdown of Saves by Race:

- 666 were Caucasian
- 77 were African-American
- 23 were Hispanic
- 2 were Asian
- 1 was Undisclosed

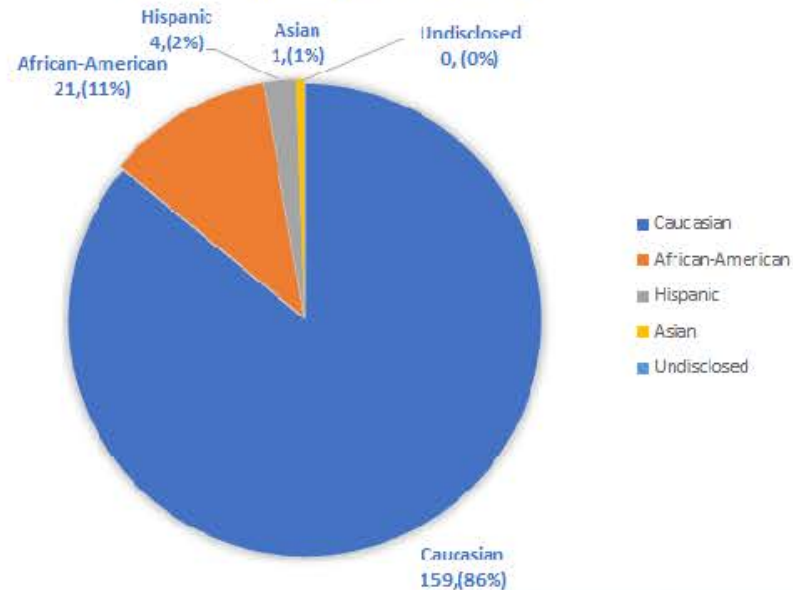
2017 BREAKDOWN BY RACE



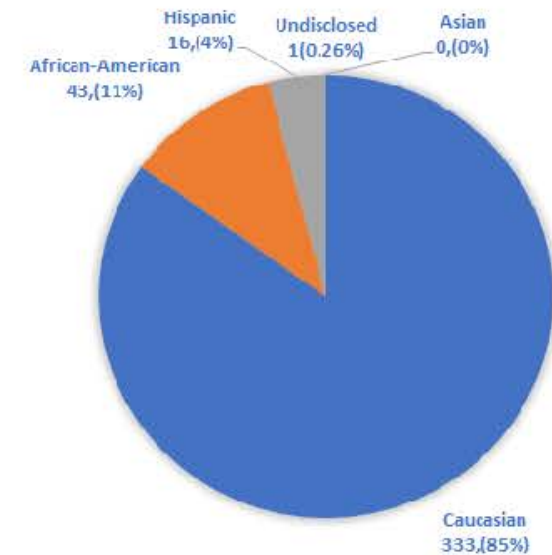
2018 BREAKDOWN BY RACE



2019 BREAKDOWN BY RACE



2020 BREAKDOWN BY RACE



OPIOID PRESCRIPTIONS PER MONTH BY YEAR- AR RESIDENTS BY AR PRESCRIBERS



Total Prescriptions:

2019: 2,688,688

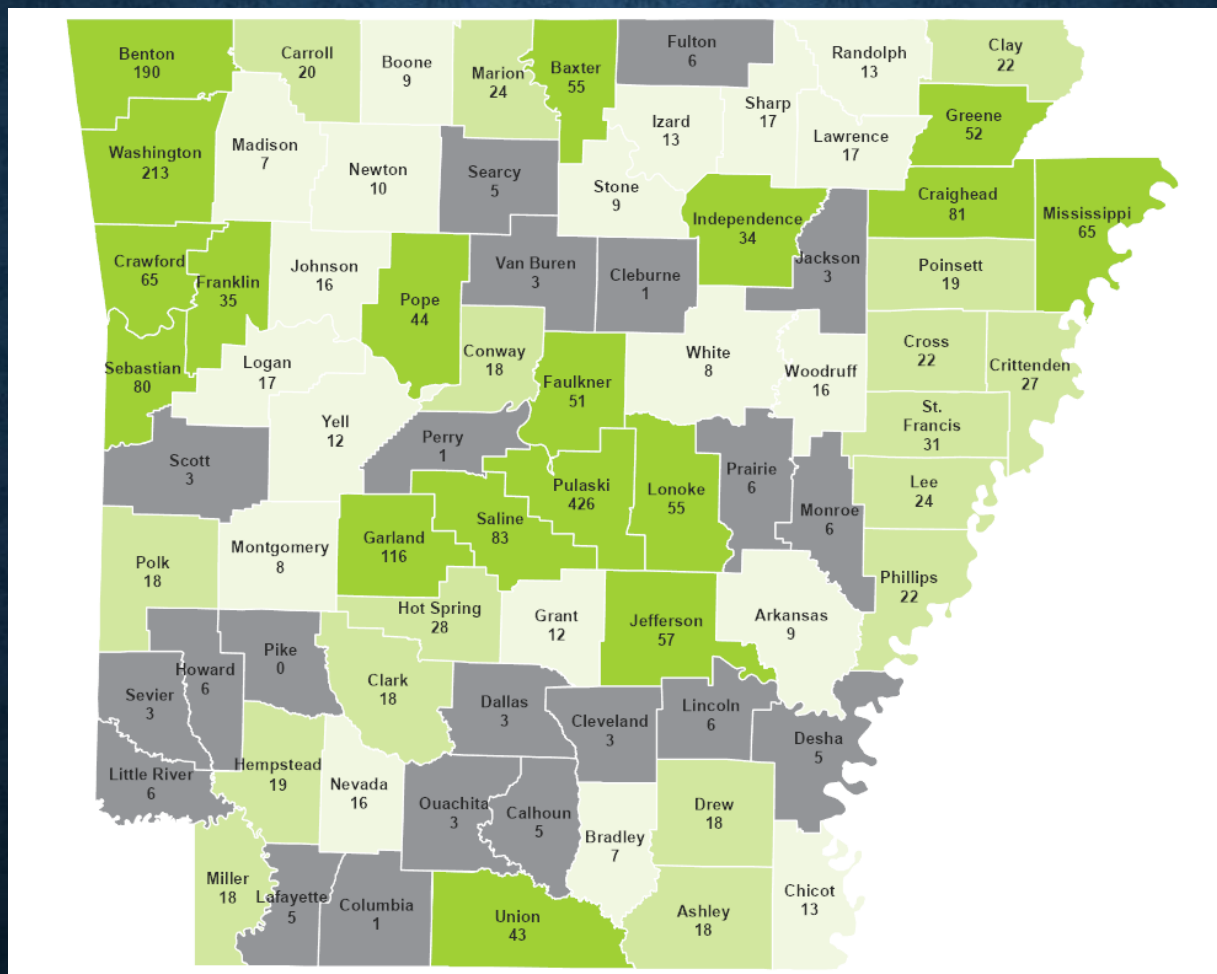
2020: 2,491,667

EMS NALOXONE DATA

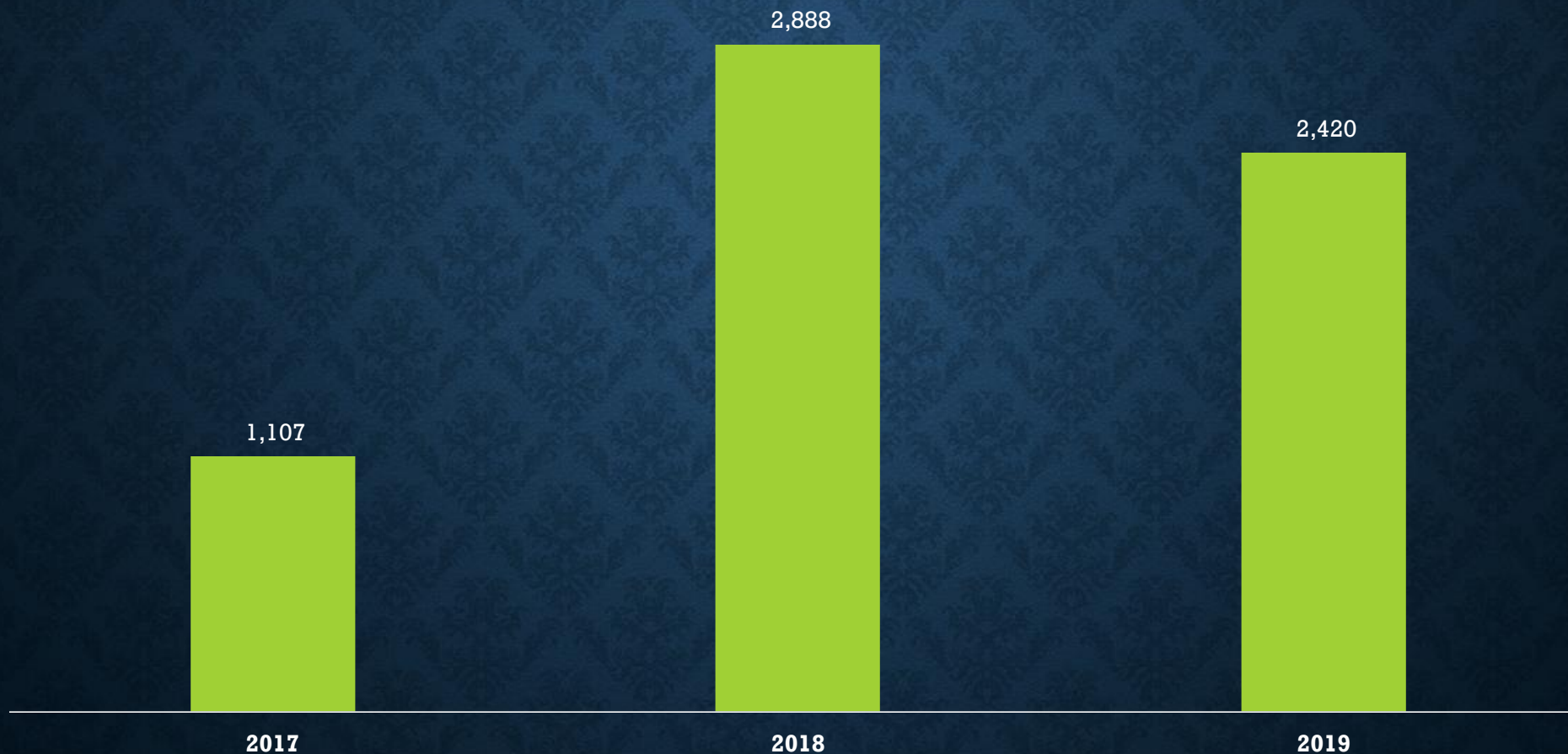
Source: Arkansas Department of Health

2019 Total EMS Naloxone Administrations

Arkansas State Total: 2,420

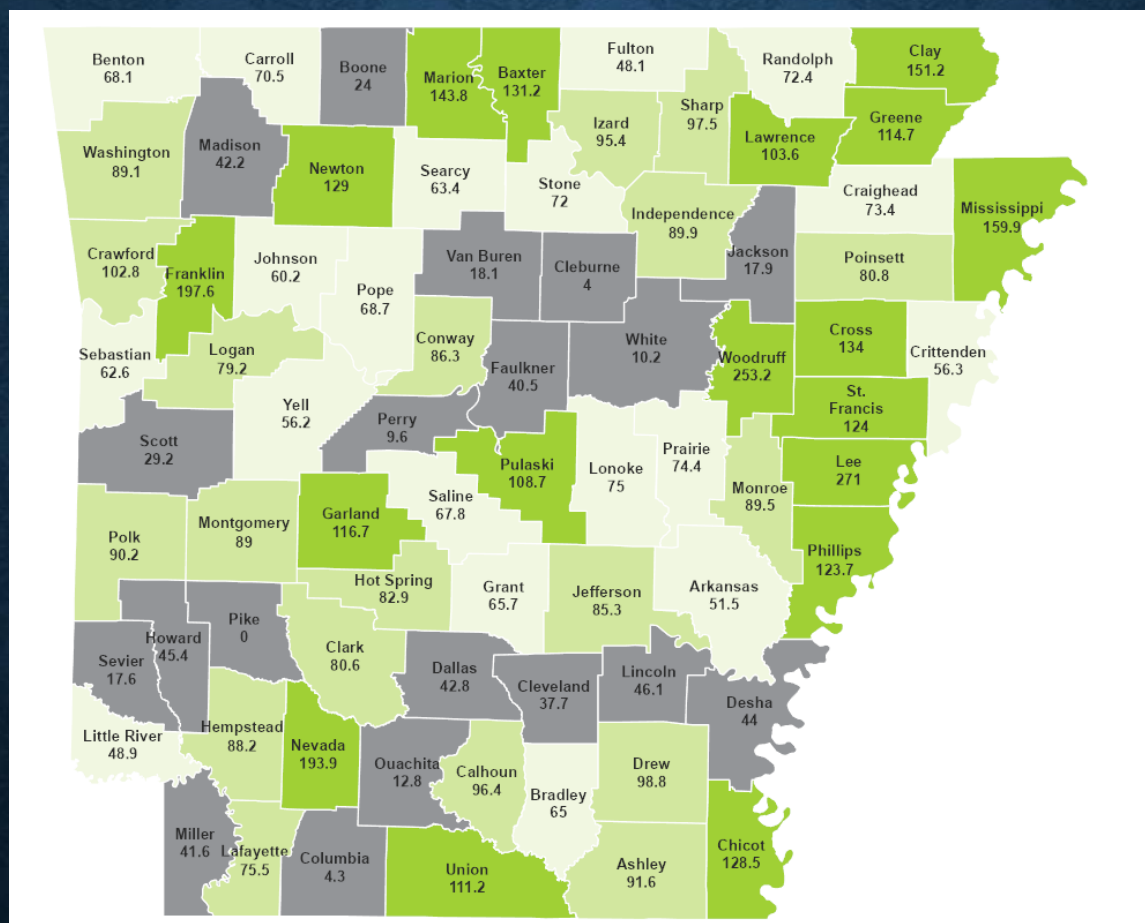


Total EMS Naloxone Administrations by Year



2019 EMS Naloxone Rate per 100,000 Persons

Arkansas State Rate: 80.2





Kirk Lane

Arkansas Drug Director

Office: 501-618-8690

Email: kirk.lane@asp.arkansas.gov